

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 1

10151 CROYDON WAY
SACRAMENTO, CA 95827-2106
(916) 855-7700



Inspection Report

Campbell Soup Company
6200 Franklin Boulevard
Sacramento, California 95824

EPA I.D. No. CAD009/198367

Inspected by: Stephen Posner

Date of Inspection: October 23, 1990

Date of Report: November 2, 1990

I. Purpose

Resource Conservation Recovery Act (RCRA) Facility
Inspection

II. Representatives Present

Robert Cook, Director Safety/Environmental, Campbell Soup
Company

Stephen Posner, Associate Hazardous Materials Specialist,
Department of Health Services/Toxic Substances Control
Program (Department), Region 1

III. Owner/Operator

Campbell Soup Company
6290 Franklin Boulevard
Sacramento, CA 95824
(916) 395-5045

IV. Background

The Campbell Soup Company (Campbells) produces convenience
foods and juices. Campbells was granted an Interim Status
Document (ISD) on March 30, 1981 and on April 6, 1987
Campbells was issued its current hazardous waste facility
permit.

The following is a summary of DHS' inspection at
Campbells:

- **Asbestos:** Generated infrequently from repair and maintenance of pipe insulation. Waste is transported via registered hazardous waste hauler to landfills which can accept asbestos.
- **Battery Acids:** Generated from the replacement of batteries used in various types of machinery. Acids are disposed/recycled at Chemical Waste Management's Kettleman Hills Facility.
- **Organic Solids:** From the use of solvents in machine cleaning and can manufacturing. Wastes are transported by American Environmental Management Corporation to a permitted disposal/recycling facility.
- **Paint Residues:** Generated during the can painting process in the past disposal has been at USPCI a Class I disposal site in Utah.
- **Tank Bottom Wastes:** Generated from the cleanout of product storage tanks.

After collection at various locations in the plant, wastes are stored at the drum storage area. The storage facility is a corrugated metal building with bermed concrete flooring. Warning signs are posted in English and Spanish. The facility is equipped with a telephone, safety shower, portable eyewash, fire extinguisher and personal safety equipment. Other emergency and spill control equipment is stored in or near the storage building.

VII. Violations

1. Title 22, California Code of Regulations (CCR) Section 66482(a)(1).

Campbells did not have a manifest document number on manifest #89893528 (asbestos waste).

2. Title 22 CCR Section 66508(a)(2); Code of Federal Regulations (CFR) Section 262.34(a)(2).

Campbells had five drums of hazardous waste which did not have start of accumulation dates.

3. Title 22 CCR Section 67740(a)(5); CFR 40, Section 268.7(b)(4).

Manifest #89893528 did not have the required land disposal restriction notification.

VIII.Observations

When I arrived at Campbells I met with Mr. Cook in his office. Mr. Cook explained that a diesel fuel spill had occurred earlier that morning. Appropriate government agencies had been notified and a cleanup contractor was enroute to Campbells.

During the records review the following documents were reviewed: Facility Permit, Operations Plan, Training Records, Annual Reports, Contingency Plan, Daily Inspection Logs, Closure Plan and Manifests.

All records reviewed appeared to be in order except for the following: Manifest #89893528 did not have the required Land Ban notification; Manifest #88635309 did not have a manifest document number.

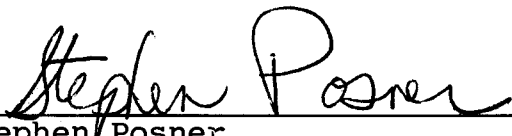
The walkthrough inspection was conducted with Mr. Cook's assistance. Mr. Cook said that Campbells has a security system which operates 24 hours per day. The entire property is surrounded by chain link fencing and all visitors and plant personnel must check in at guard posts near the gates to the plant.

At the drum storage area Mr. Cook and I met with Mr. Chuck Danlie. My inspection of the storage area revealed five drums which did not have start of accumulation dates. Most of the wastes in storage consisted of various solvents and waste oil. Mr. Danlie said that access to the storage facility is limited and that all drums must be checked in through him. Overall, the permitted storage facility appeared clean and orderly.


The area where the diesel spill occurred was located near the storage facility. At the time of my departure from the storage facility, a cleanup crew from American Environmental Management Corporation (AEMC) was on site and had begun a cleanup of the spilled material.

Discussion with Management

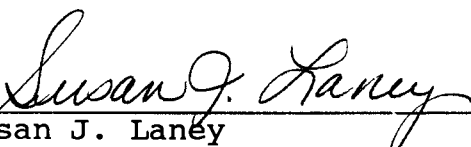
An exit interview was conducted with Mr. Cook. The violations noted during the inspection were discussed, and a toxic ticket corrective action order and complaint for penalty was issued. A signed copy of the toxic ticket was left with Mr. Cook; the total penalty for violations noted on this date came to \$750.



Stephen Posner
Associate Hazardous Materials
Specialist



Date Submitted



Susan J. Laney
Senior Hazardous Materials
Specialist



Date Approved

Campbell Soup Company
6200 Franklin Boulevard
Sacramento, CA 95824
23 October 1990
EPA I.D.# CAD009198367

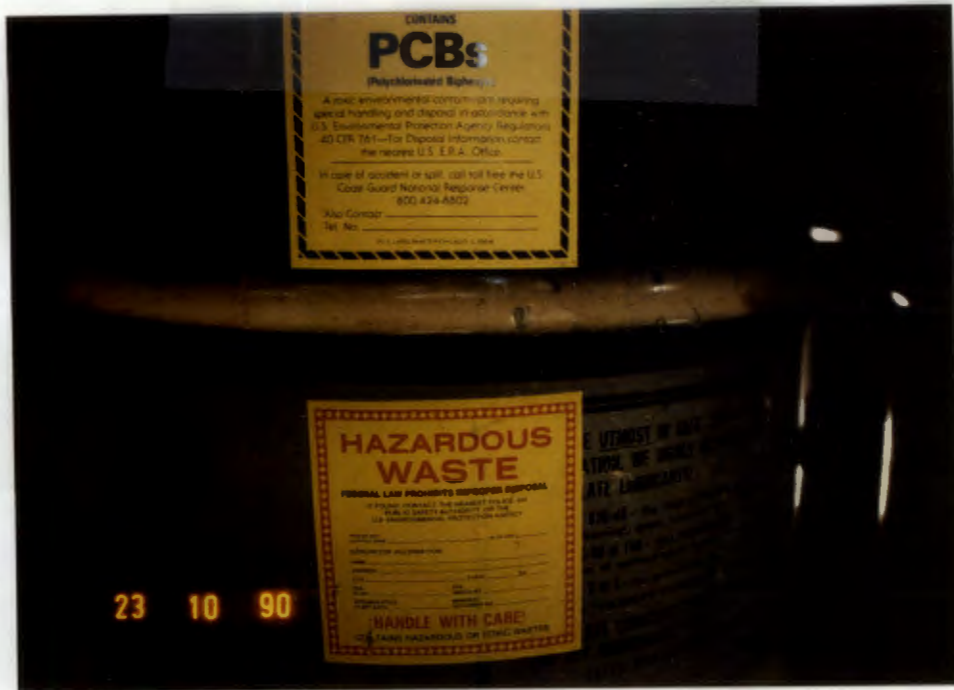


1. Entrance to hazardous waste storage facility.



2. Another view of hazardous waste storage facility. Note hazardous waste warning signs.

Campbell Soup Company
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3. Closeup of hazardous waste drum. Note lack of complete labeling.



4. Another drum without adequate labeling.

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23 October 1990
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5. Another drum without adequate labeling.



6. Area where diesel fuel spill occurred. AEMC cleanup personnel arrived shortly after photograph was taken.

FINANCIAL RESPONSIBILITY REVIEW

TO: Sue Loney SEU Bill Ryan FPU REGION 1, 2, 3, 4
 FROM: Nancy Jately FRU PHONE 324-1804

For the purpose of the financial responsibility review, the results of the evaluation are good for sixty (60) days from the date of this review and are as follows:

FACILITY Campbell Soup Company ADDRESS 6200 Franklin Blvd. Sacramento, CA EPA ID# CAD009198367

I. FACILITY TYPE

MAJOR _____ NON-MAJOR / RCRA / NON-RCRA _____
 TREATMENT / STORAGE / DISPOSAL _____ OTHER _____
 INTERIM _____ PERMITTED / PBR _____ TTU _____

II. FINANCIAL ASSURANCE FOR CLOSURE/POST-CLOSURE

TYPE OF DOCUMENT: Financial Test 10/22/90
 COST ESTIMATES: CLOSURE \$ 75,000 POST-CLOSURE \$ N/A
 DEFICIENCY: CLOSURE \$ 0 POST-CLOSURE \$ _____
 RESULTS: PASS X FAIL _____ (SEE COMMENTS)

III. LIABILITY COVERAGE

TYPE OF DOCUMENT: Financial Test
 DOLLAR AMOUNTS: SUDDEN \$ _____, 2 mil. NON-SUDDEN \$ N/A, _____
 (PER OCCURRENCE) (AGGREGATE) (PER OCCURRENCE) (AGGREGATE)
 RESULTS: PASS X FAIL _____ (SEE COMMENTS)

IV. ENFORCEMENT ACTION

DATE STATUS

1. REPORT OF VIOLATIONS ISSUANCE: _____
2. CORRECTIVE ACTION ORDER: _____
3. ANTICIPATED ACTION: _____
4. OTHER REFERRALS: _____

COMMENTS In Compliance

Nancy Jately 10/31/90
 FRU ANALYST DATE

Franklin P.B. 10-31-90
 FRU CHIEF DATE

10/31/90
 CMEL DATE

FIRST COPY - SEU

SECOND COPY - FPU

THIRD COPY - FRU

DEPARTMENT OF HEALTH SERVICES
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SACRAMENTO, CA 95827-2106
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FY 89 CALIFORNIA CMEL

1. EPA ID: CA D 0 0 9 1 9 8 3 6 7
2. Handler Name: Campbells Soup
3. Handler Address: 47th Avenue & Franklin Blvd
Sacramento
4. Date of Inspection: 10/23/90
5. Type of Inspection: CEI (1)
6. Inspector's Name Posner
(Last Name Only)
7. Office: Region 1

FY 90 CALIFORNIA CMEL

1. EPA ID: CA _____
2. Handler Name: _____
3. Handler Address: _____

4. Date of Inspection: ____/____/____
5. Type of Inspection: Land Ban
6. Inspector's Name: _____
7. Office: Region 1

Interim Status - Cont.
(Part 270 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(d) 90 days prior to change in ownership?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
(e) Have the changes made not amounted to reconstruction?*	<input type="checkbox"/>	<input type="checkbox"/>	_____
Termination of interim status:			
Did the facility submit a requested Part B in full, and on time? 270.10(e)(5), 270.73(b)	<input type="checkbox"/>	<input type="checkbox"/>	_____

For land disposal facilities granted interim status prior to 11/8/84, did the facility submit before 11/8/85: 270.73(c)-

(1) Part B of the permit application?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
(2) Certification of compliance with all applicable ground water monitoring and financial responsibility requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

For land disposal facilities granted interim status after 11/8/84, did the facility submit within 12 months: 270.73(d)-

(1) Part B of the permit application?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
(2) Certification of compliance with all GW monitoring and financial responsibility requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
For incinerator facilities, did the facility submit a Part B before 11/8/86? 270.73(e)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
For all other facilities, was a Part B submitted before 11/8/88**? 270.73(f)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

See also applicable interim-status requirements for surface impoundments (265.221(b), p. K1) and landfills (265.301(b), p. N1).

*>50% of the cost of an entirely new facility, except for changes made solely for complying with new regulations for tanks (265.193) and/or Land disposal Restrictions (268).

**If no, interim status will terminate on 11/8/92.

General Facility Standards:
(Part 264 Subpart B)

Required Notices:	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the RA been notified at least 4 weeks prior to the receipt of HW from a foreign source? 265.12(a) (see also Generators, 262 Subpart F.)	—	—	NA
Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)	—	—	
If a permit has been transferred to a new owner/operator, was the permit modified or revoked and reissued to identify the new permittee? 270.40	—	—	
General Waste Analysis:			
Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each HW? 265.13(a)(1)	✓	—	
Did the facility perform the analysis before treating, storing or disposing of any HW? 265.13(a)(1)	✓	—	
Does the facility have records documenting the required HW analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a)(2)	✓	—	
Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a)(3)	✓	—	
Is the analysis repeated when there is a change in the generating process? 265.13(a)(3)(i)	✓	—	
For off-site facilities, is the analysis repeated when the HW received does not match the HW designated on the manifest? 265.13(a)(3)(ii)	—	—	NA

General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For off-site facilities, does the facility inspect or analyze each movement of HW to verify that the HW received matches the identity of the HW specified on the manifest? 265.13(a)(4)	—	—	<u>NA</u>
Has the facility developed and followed a written waste analysis plan, and is the plan kept at the facility? 265.13(b)	—	—	<u>1</u>
Does the waste analysis plan contain the following elements: 265.13(b)-			
(1) Parameters of analysis of each HW handled and the rationale for the selection of these parameters?	✓	—	
(2) The methods which will be used to test for these parameters?	—	—	
(3) Sampling method used to obtain a representative sample of each HW?	—	—	
(4) Frequency with which the initial analysis will be reviewed or repeated?	—	—	
(5) For off-site facilities, the analysis that generators have agreed to supply?	—	—	
(6) The methods which will be used to meet the additional analysis requirements for:			
Tanks?(265.198-200)	✓	—	
Surface Impoundments?(265.225, & p.K2)	—	—	<u>NA</u>
Waste Piles?(265.252)	—	—	
Land Treatment?(265.273)	—	—	
Liquids in landfills?(265.314)	—	—	
Incinerators?(265.341)	—	—	
Thermal Treatment?(265.375)	—	—	
Other Treatment?(265.402)	—	—	
Land Disposal Restrictions?(268.7)	✓	—	

Complete applicable checklist on each unit.

General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For off-site facilities, does the plan contain the following elements: 265.13(c)-			
(1) Description of procedures used to identify each movement of HW?	—	—	<u>NA</u>
(2) Description of the sampling method used to obtain a representative sample of the HW?	—	—	
Unless exempt under 265.14(a)(physical contact or disturbance of the waste and unit will not cause harm), do security measures include:			
A 24-hour surveillance system?			
265.14(b)(1) or:	—	—	
Artificial or natural barriers that completely enclose the facility?			
265.14(b)(2)(i) and:	—	—	
Means to control entry onto the active portions of the facility at all times?			
265.14(b)(2)(ii)	—	—	
Are signs with the legend "Danger-Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)-			
At each entrance and any other approach to active portions of the facility?	—	—	
Legible from at least 25 feet away?	—	—	
Written in English and any other language predominant in the surrounding area?	—	—	
General Inspection Requirements:			
Does the facility inspect for malfunctions, deterioration, operator errors, and HW discharges often enough to correct problems before they cause harm? 265.15(b)(1)	✓	—	
Does the facility follow a written inspection schedule? 265.15(a)	✓	—	

General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the schedule kept at this facility? 265.15(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b)(3)-	<input type="checkbox"/>	<input type="checkbox"/>	
Monitoring equipment?	<input type="checkbox"/>	<input type="checkbox"/>	
Safety, emergency equipment?	<input type="checkbox"/>	<input type="checkbox"/>	
Security devices?	<input type="checkbox"/>	<input type="checkbox"/>	
Operating and structural equipment?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the schedule include: 265.15(b)(4)-	<input type="checkbox"/>	<input type="checkbox"/>	
The frequency of inspection for each item?	<input type="checkbox"/>	<input type="checkbox"/>	
Daily inspections for loading and unloading areas?	<input type="checkbox"/>	<input type="checkbox"/>	
The inspection frequencies required for each unit?	<input type="checkbox"/>	<input type="checkbox"/>	
Has the facility taken immediate remedial action to correct hazards revealed on an inspection? 265.15(c)	<input type="checkbox"/>	<input type="checkbox"/>	
Are inspections recorded in an inspection log?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the log include: 265.15(d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Date and time of inspection?	<input type="checkbox"/>	<input type="checkbox"/>	
Name of inspector?	<input type="checkbox"/>	<input type="checkbox"/>	
Observations noted?	<input type="checkbox"/>	<input type="checkbox"/>	
Date and nature of repairs or other remedial actions?	<input type="checkbox"/>	<input type="checkbox"/>	
Are inspection records kept for at least 3 years? 265.15(d), 265.73(b)(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the facility have a HW personnel training program? 265.16(a)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
Is it directed by a person trained in HW management procedures? 265.16(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	

General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) Key parameters for automatic waste feed cut-off systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iii) Communication or alarm systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iv) Response to fire or explosions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(v) Response to ground water contamination incidents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(vi) Emergency shutdown of operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are new personnel supervised until training is completed? 265.16(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Do new personnel complete the training within 6 months? 265.16(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Do personnel take part in an annual review of the initial training? 265.16(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2) Job Description?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(3) Description of required HW training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(4) Documentation that HW training or job experience required has been completed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

General Facility Standards: - Continued
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Requirements for ignitable, reactive, or incompatible wastes:			
Are precautions taken to prevent accidental ignition or reaction, including: 265.17(a)-			
Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
No smoking signs in hazard areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is the T/S/D of ignitable, reactive or incompatible waste conducted so that it does not: 265.17(b)-			
(1) Generate extreme heat or pressure, fire or explosion, or violent reaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2-3) Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(4) Damage structural integrity of HW containment devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(5) Otherwise threaten human health or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Preparedness and Prevention:
(Part 265 Subpart C)

Yes No Comments

Location Standards:

The facility did not place HW in a salt dome, salt bed formation, underground mine or cave? (265.18)

_____  _____

Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31

_____  _____

Does the facility have the following equipment where applicable: 265.32-

(a) Internal communications or alarm system capable of providing immediate emergency instruction?

_____  _____

(b) Telephone or 2-way radios at the scene of operation?

_____  _____

(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?

_____  _____

(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?

_____  _____


Does the facility test and maintain all emergency equipment in operable condition? 265.33

_____  _____

Do personnel in areas where HW is being handled have immediate access to internal alarm or communication systems, or voice or visual contact with another employee? 265.34(a)

_____  _____

Can personnel that operate the facility while alone immediately access external emergency assistance? 265.34(b)

_____  _____

Preparedness and Prevention - Continued
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35	✓		
Arrangements With Local Authorities:			
Has the facility attempted to make the following arrangements/agreements:			
Familiarize police, fire dept., and emergency response teams with HW operations? 265.37(a)(1)	✓		
Designate primary emergency authority? 265.37(a)(2)			
With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)			
Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)			
Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)			

Contingency Plan and Emergency Procedures:
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility have a contingency plan designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents? 265.51(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the plan describe actions personnel must take to comply with 265.51 and 265.56 responses? 265.52(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility? 265.52(d)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	<input type="checkbox"/>	<input type="checkbox"/>	
Is the plan maintained at the facility? 265.53(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the plan been reviewed any immediately amended whenever: 265.54	<input type="checkbox"/>	<input type="checkbox"/>	
(a) Applicable regulations are revised?	<input type="checkbox"/>	<input type="checkbox"/>	
(b) The plan fails in an emergency?	<input type="checkbox"/>	<input type="checkbox"/>	
(c) Facility changes required it?	<input type="checkbox"/>	<input type="checkbox"/>	

Contingency Plan and Emergency Procedures: - Continued
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(d) The list of emergency coordinators changes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(e) The list of emergency equipment changes?	<input type="checkbox"/>	<input type="checkbox"/>	
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	<input type="checkbox"/>	<input type="checkbox"/>	
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	<input type="checkbox"/>	<input type="checkbox"/>	
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	<input type="checkbox"/>	<input type="checkbox"/>	
If an emergency situation has occurred at this facility, did the emergency coordinator (EC) immediately:			
Activate alarm systems? 265.56(a)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
Notify the appropriate response agencies? 265.56(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)	<input type="checkbox"/>	<input type="checkbox"/>	

Contingency Plan and Emergency Procedures: - Continued
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If assessment indicates the release could threaten harm outside the facility, does the EC:			
Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide?			
265.56(d)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800/424-8802?			
265.56(d)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Did the report include: 265.56(d)(2)-			
(i) The name and phone # of the reporter?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) Name and address of the facility?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) Time and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(iv) Name and quantity of materials involved to the extent known?	<input type="checkbox"/>	<input type="checkbox"/>	
(v) The extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(vi) The possible hazards to the outside area?	<input type="checkbox"/>	<input type="checkbox"/>	
During the emergency, does the E.C. take all reasonable measures to minimize the release?			
265.56(e)	<input type="checkbox"/>	<input type="checkbox"/>	
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment?			
265.56(f)	<input type="checkbox"/>	<input type="checkbox"/>	
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release?			
265.56(g)	<input type="checkbox"/>	<input type="checkbox"/>	

Contingency Plan and Emergency Procedures: - Continued
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the EC ensure that in the affected areas of the facility: 265.56(h)-			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2) All emergency equipment is clean and fit for use before operations resume?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the facility notify the R.A., state and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If the contingency plan has been implemented:			
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Name, address, and phone # of the facility?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Date, time, and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Name and quantity of materials involved?	<input type="checkbox"/>	<input type="checkbox"/>	
(5) The extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(6) A hazard assessment?	<input type="checkbox"/>	<input type="checkbox"/>	
(7) An estimate of the quantity and disposition of recovered material?	<input type="checkbox"/>	<input type="checkbox"/>	

Manifest System, Record Keeping, and Reporting:
(Part 265 Subpart E)

Yes No Comments

Manifest System:

If the facility receives HW from an off-site source, do they comply with the following manifest requirements:

(1) Sign and date each copy of the manifest? 265.71(a)(1)

—

—

NA

(2) Note any significant* discrepancies in the manifest? 265.71(a)(2)

—

—

(3) Give transporter one copy of the signed manifest? 265.71(a)(3)

—

—

(4) Within 30 days after delivery, send a copy of the manifest to the generator? 265.71(a)(4)

—

—

Are records of past shipments retained for 3 years? 265.71(a)(5)

—

—

Manifest Discrepancies:

Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter? 265.72(b)

—

—

For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures? 265.72(b)

—

—

Note: For TSDs that generate HW complete Part 262 checklist p.6, Manifests, and p. 9, Record Keeping and Reporting.

* Significant discrepancies are:

1. For bulk waste; variations > 10% in weight.
2. For containerized waste; variations > one drum.
3. Obvious differences such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest.

Manifest System, Record Keeping, and Reporting: - Continued
(Part 265 Subpart E)

Unmanifested Waste Report: Yes No Comments

For a facility that has accepted HW from an off-site source without an accompanying manifest, and the generator was not a conditionally exempt small quantity generator (261.5), was a report containing the required information submitted to the RA within 15 days after receiving the HW? 265.76(a-g)

NA

Operating Record:

Does the facility maintain an operating record? 265.73(a)

Does the operating record contain the following information:

A description and the quantity of each waste received as required by Appendix I? 265.73(b)(1)

The method(s) and date(s) of its treatments, storage or disposal as required by Appendix I? 265.73(b)(1)

The location of each waste within the facility and the quantity at each location? 265.73(b)(2)

For disposal facilities, the location and quantity of each waste recorded on a map or diagram of each cell or disposal area? 265.73(b)(2)

For all facilities, is the location and quantity information cross-referenced to specific manifest numbers? 265.73(b)(2)

Records the results of all waste analyses and trial tests? 265.73(b)(3)

Reports detailing all incidents that required implementation of the contingency plan? 265.73(b)(4)

Manifest System, Record Keeping, and Reporting: - Continued
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Records the results of inspections for the last three years? 265.73(b)(5)	—	—	<u>NO</u>
Monitoring, testing, and analytical data? 265.73(b)(6)	—	—	
All closure and post-closure costs as applicable? 265.73(b)(7)	—	—	
Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units when granted a Part 268 case-by-case extension, monitoring data required by a successful petition, certifications under 268.8 (1st and 2nd third soft hammer), and all applicable generator notices? 265.73(b)(8)	—	—	
Is a copy of each notice, and any applicable certification and demonstration, required of the generator under Part 268 retained for each shipment of wastes received from <u>off-site</u> for: 265.73(b)-			
(9) Treatment?	—	—	
(11) Disposal?	—	—	
(13) Storage?	—	—	
Is all information required of a generator under Part 268 including notices (except for the manifest number), and any applicable certification and demonstration, on file where the facility is further handling restricted wastes <u>generated on-site</u> by: 265.73(b)-			
(10) Treating?	—	—	
(12) Disposing?	—	—	
(14) Storing?	—	—	
Availability, Retention, Disposition of Records:			
Are all records, including plans, available for inspection? 265.74(a)	✓	—	

Manifest System, Record Keeping, and Reporting: - Continued
(Part 265 Subpart E)

Biennial Report:	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the facility submitted a biennial report to the RA by March 1 of each even numbered year? 265.75	✓	—	_____
Was the report submitted on EPA form 8700-13B? 265.75	✓	—	_____
Did the report cover facility activities during the previous calendar year? 265.75	✓	—	_____
Does the report include the following information: 265.75-			
(a) EPA identification number, name and address of the facility?	✓	—	_____
(b) Calendar year covered by report?	—	—	_____
(c) For off-site facilities, the EPA ID number of each HW generator?	—	—	_____
(d) A description of and quantity of each type of HW received and, for off-site facilities, the EPA ID number of each generator listed with this information?	—	—	_____
(e) Methods of treatment, storage, or disposal for each type of HW?	—	—	_____
(f) Ground water monitoring data under 265.94(a)(2)(ii-iii) and (b)(2)?	—	—	_____
(g) Most recent closure and post-closure cost estimates?	—	—	_____
(h) Signed certification?	—	—	_____

Ground Water Monitoring:
(Part 265 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the facility operates a HW surface impoundment, landfill, or land treatment unit*, has a ground water monitoring program consisting of at least one upgradient and 3 downgradient wells been implemented (and certified under 270.73)? 265.90(a)	—	—	N A
If NO, is a written waiver demonstration, certified by a qualified geologist or geotechnical engineer, kept at the site? 256.90(c)	—	—	
Date of last CME or O&M: / /			EPA? State?
Is a ground water sampling and analysis plan kept at the facility? 265.92(a)	—	—	
Does it include procedures and techniques for: 265.92(a)-			
(1) Sample collection?	—	—	
(2) Sample preservation and shipment?	—	—	
(3) Analytical procedures?	—	—	
(4) Chain of custody control?	—	—	
Has an outline of a ground water quality assessment program been prepared? 265.93(a)	—	—	
Have records been kept of: 265.94(a)(1)			
Analysis for all parameters (see next page) quarterly for the first year as required by 265.92(c)	—	—	
Ground water quality analysis annually since the first year as required by 265.92(d)(1)?	—	—	
Ground water contamination indicators at least semi-annually since the first year as required by 265.92(d)(2)?	—	—	
Ground water surface elevations taken during each sampling of each well as required by 265.92(e)	—	—	

*Including units that are inactive but not certified as clean closed.

Ground Water Monitoring: - Continued
(Part 265 Subpart F)

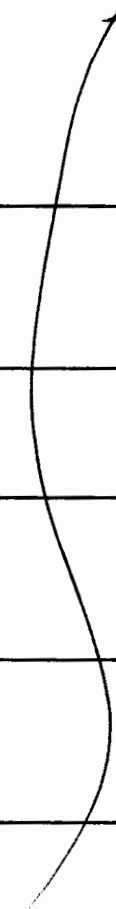
	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the owner or operator record ground water analytical data as measured and in a form necessary for the determination of statistical significance for the compliance period of the facility? 265.99	—	—	NA
The Student's T-test calculations (at the 0.01 level of significance) for comparison of ground water contamination indicators over initial background as required in 265.93(b)?	—	—	1
If the facility found comparisons for downgradient wells made under 265.93(b) showed a significant increase (or pH decrease) over background levels, proceed to page F3.			
Have the following been submitted to the RA: 265.77(b), 265.94(a)(2)			
During the first year, the initial background concentrations of parameters listed in 265.92(b) within 15 days after completing each quarterly analysis? 265.94(a)(2)(i)	—	—	NA
For each well, were any parameters whose concentrations or values exceeded the maximum contaminant levels allowed in drinking water supplies (Appendix III) separately identified? 265.94(a)(2)(i)	—	—	
Annual reports by each March 1 including:			
Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b)? 265.94(2)(ii)	—	—	
<u>EPA interim primary drinking water standards (265.92(b)(1)):</u> Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate (as N), Selenium, Silver, Endrin, Lindane, Methoxychlor, Toxaphene, 2-4 D, 2,4,5-TP Silver, Radium, Gross Alpha, Gross Beta, Turbidity (surface water), Coliform Bacteria.			
<u>Parameters establishing ground water quality (265.92(b)(2)):</u> Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.			
<u>Parameters used as indicators of ground water contamination 265.92(b)(3)):</u> pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.			

Ground Water Monitoring: - Continued
(Part 265 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Separate identification of any significant differences from initial back-ground found in the upgradient wells? 265.94(2)(ii)	—	—	NA
Results of the previous year's evaluation of ground water elevations, and a description of any applicable response? 265.94(2)(iii)	—	—	
Reporting by facilities that may be affecting ground water quality: 265.77(b), 265.93(d)			
If the facility confirmed the determination that they may be affecting ground water quality was not made in error (265.93(c)(2)), was a written notice sent to the RA within 7 days of confirmation? 265.93(d)(1)	—	—	
Within 15 days of notification to the RA was a certified ground water quality assessment plan submitted? 265.93(d)(2)	—	—	
After implementation of this plan, did the facility determine if HW or HW constituents from the facility have entered the ground water? 265.93(d)(4)	—	—	
Within 15 days after the determination was a written report containing the assessment of ground water quality submitted to the RA? 265.93(d)(5)	—	—	
If HW or HW constituents <u>have</u> been determined to have entered the ground water, are determinations of HW or HW constituents continued on a quarterly basis until final closure of the facility*? 265.93(d)(7)	—	—	

*If the program was implemented during the post-closure care period, determinations made in accordance with the ground water quality assessment plan may cease after the first determination per 265.93(d)(7)(ii).

Ground Water Monitoring: - Continued
(Part 265 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If <u>HW</u> or <u>HW</u> constituents have been determined to have entered the ground water, did the owner or operator institute a corrective action program under 265.10? 264.91	—	—	NA
If <u>no</u> HW or HW constituents were shown to have entered to ground water, was the RA informed of the determination if the indicator evaluation program only (defined in 265.92 and 265.93(b)) was reinstated? 265.93(d)(6)	—	—	
Were records kept of the analysis and evaluations specified in the ground water quality assessment throughout the life of the facility? 265.94(b)(1)	—	—	
If a disposal facility, were (are) records kept throughout the post-closure period as well? 265.94(b)(1)	—	—	
Are annual reports submitted by March 1 to the RA containing the results of the ground water quality assessment program? 265.94(b)(2)	—	—	
Do the reports include the calculated or measured rate of migration of HW or HW constituents during the reporting period? 265.94(b)(2)	—	—	

Closure and Post-Closure:
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility have a closure plan 265.112(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Date: <u>6 April 87</u>
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.112(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the plan identify for the active life of the facility:			
The steps necessary to completely or partially close the facility at any point? 265.112(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
How each Hazardous Waste management unit will be closed? 265.112(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
How final closure standards (265.111) will be met? 265.112(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
The maximum extent of the operation which will be unclosed? 265.112(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
An estimate of the maximum inventory of HW ever on-site? 265.112(b)(3)	<input type="checkbox"/>	<input type="checkbox"/>	
A detailed description of the methods to be used during partial and final closure? including: 265.112(b)(3)	<input type="checkbox"/>	<input type="checkbox"/>	
Removing, transporting, treating, storing, and disposal of all HW?	<input type="checkbox"/>	<input type="checkbox"/>	
Identification of and types of off-site HW management units to be used?	<input type="checkbox"/>	<input type="checkbox"/>	
A detailed description of steps for removal or decontamination during partial and final closure? including: 265.112(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	
Contaminated containment system components, equipment, containers, structures, soils and HW residues?	<input type="checkbox"/>	<input type="checkbox"/>	
Procedures for cleaning equipment and removing contaminated soils?	<input type="checkbox"/>	<input type="checkbox"/>	
Methods for sampling and testing surrounding soils?	<input type="checkbox"/>	<input type="checkbox"/>	

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Testing criteria for determining adequacy of clean-up?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
A detailed description of all other activities necessary during partial and final closure to satisfy the closure performance standards? including: 265.112(b)(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Ground water monitoring?	<input type="checkbox"/>	<input type="checkbox"/>	
Leachate collection?	<input type="checkbox"/>	<input type="checkbox"/>	
Run-on and run off control?	<input type="checkbox"/>	<input type="checkbox"/>	
A schedule for closure of each HW unit and for final closure of the facility? Does the schedule include: 265.112(b)(6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Total time required to close each unit?	<input type="checkbox"/>	<input type="checkbox"/>	
Time required for each intervening closure activity?	<input type="checkbox"/>	<input type="checkbox"/>	
An estimate of the expected year of final closure, if the closure plan has not been approved*? 265.112(b)(7)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the facility amended the plan whenever affected by changes in: 265.112(c)(1)-			
(i) Operating plans or facility design?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) Expected year of closure?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) Problems encountered during partial or final closure?	<input type="checkbox"/>	<input type="checkbox"/>	
Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days (30 days if already in a closure period) of unexpected changes? 265.112(c)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
If the plan has already been approved, was the amended plan resubmitted to the RA by this deadline? 265.112(c)(3)	<input type="checkbox"/>	<input type="checkbox"/>	

*Also applies to facilities that use trust funds to demonstrate financial assurance and expect to close within the next twenty years.

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the date when the facility expects to begin closure either no later than 30 days after the date on which any HW management unit receives the known final volume of HW? or:	✓	—	_____
Is there a reasonable possibility that the HW management unit will receive additional HW no later than one year after receiving the final volume? 265.112(d)(2)	✓	—	_____
Does the schedule for closure allow for the following?:			
Treatment, removal, or disposal of HW within 90 days after receipt of final volume of HW or after approval of closure plan? 265.113(a)	✓	—	_____
Completion of closure plan activities within 180 days after receipt of final volume of HW or after approval of closure plan? 265.113(b)	✓	—	_____
If any closure activities have commenced, see page G5.			
Post-closure plan:			
If the facility operates a hazardous waste disposal unit, do they have a post-closure plan? 265.118(a)	—	—	NA
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.118(b)	—	—	_____
If the facility was intending to clean-close a surface impoundment or waste pile and found they are required to close it as a landfill, did they submit a post-closure plan to the RA within 90 days? 265.118(a),(d)(3-4)	—	—	_____
Does the plan provide for 30 years of post-closure care (unless granted an exemption under 265.118(g))? 265.117(a)(1)	—	—	_____

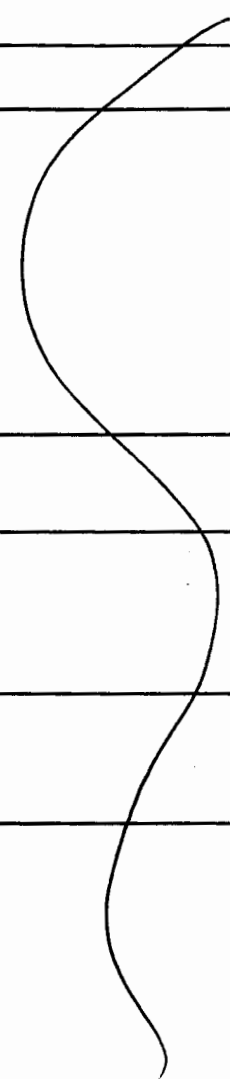
Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the plan describe the monitoring activities and the frequency they will be performed to comply with each unit's regulatory requirements? 265.118(c)(1)	___	___	NA
Does the plan describe the maintenance activities and the frequency they will be performed to ensure: 265.118(c)(2)-			
(i) The integrity of the cap, final cover or other containment devices?			
(ii) The continued function of the monitoring devices?	___	___	
Does the plan identify the name, address and phone number of the post-closure period contact? 265.118(c)(3)	___	___	
Did the facility amend the plan when ever changes in operating plans, facility design, or events which occur during the active life of the facility affect their post-closure plan? 265.118(d)(1)	___	___	
Did the owner or operator submit a written notification of or request for a permit modification to authorize a change in the approved post-closure plan? 265.118(d)	___	___	
Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days of any unexpected changes? 265.118(d)(2)	___	___	
Was the amended plan resubmitted to the RA by this deadline? 265.118(d)(3)	___	___	

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Closure Activities:			
Deadlines for submission of post-, partial-, and final closure plans:			
If the plans had not been approved, had the facility submitted the plan at least 180 days prior to the expected closure of the first surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d), -.118(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Had a closure plan been submitted 45 days prior to the expected closure of a facility with only tanks, container storage, or incinerator units? 265.112(d)	<input type="checkbox"/>	<input type="checkbox"/>	
If the closure plan had already been approved, was it resubmitted 60 days prior to the expected closure of any surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d)	<input type="checkbox"/>	<input type="checkbox"/>	
Was the "expected closure" date within:			
30 days after a HW unit received its known final volume of HW? 265.112(d)(2), -.118(e) or:	<input type="checkbox"/>	<input type="checkbox"/>	
If there was a reasonable possibility the HW unit would receive additional waste, one year since it actually last received a volume of HW (unless granted an exemption)? 265.112(d)(2), -.118(e)	<input type="checkbox"/>	<input type="checkbox"/>	
Was the closure plan submitted within 15 days after termination of interim status for any reason other than being granted a final permit? 265.112(d)(3), -.118(e)(1)	<input type="checkbox"/>	<input type="checkbox"/>	

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Facilities in the process of closure:			<i>No ongoing closure activities</i>
Was all HW in the closing unit or facility treated, removed, or disposed of on-site, in accordance with the approved closure plan, within 90 days after receiving either the final volume of HW or approval of the closure plan? 262.113(a) or:	—	—	
Did the RA approve a longer period? 262.113(a)(1-2)	—	—	
Facilities that have completed closure activities:			
Did the facility complete partial and final closure activities within 180 days after either receiving the final volume of HW or approval of the closure plan? 265.113(b) or:	—	—	
Was the facility granted exemption? 265.113(b)	—	—	
Have all equipment and structures been properly disposed of or decontaminated by removing all HW and contaminated residues? 265.114	—	—	
Have all contaminated soils been properly disposed of or decontaminated unless otherwise specified? 265.114	—	—	
Certification of closure:			
Within 60 days of completion of closure of each surface impoundment, waste pile, land treatment, landfill unit, or final facility closure, has a certification by the owner/operator and an independent registered professional engineer been submitted to the RA? 265.77(c), 265.115	—	—	

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
No later than the submission of the closure certification for each disposal unit, was a survey plat submitted to the RA and local land authority? 265.116	—	—	NA
Was the survey plat prepared and certified by a professional land surveyor?	—	—	
Did it indicate the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?	—	—	
Did it contain a note, prominently displayed, which states the owner's or operator's obligation to restrict disturbance of the HW disposal unit?	—	—	
Post-closure notices:			
Has the owner/operator submitted to the RA and the local land authority within 60 days of the certification of closure of each HW unit a record of the type, location, and quantity of HW disposed of within each disposal unit since January 12, 1981? 265.74(c), 265.119(a)	—	—	NA
Within 60 days of certification of closure for the first HW disposal unit, and within 60 days of certification of the last HW disposal unit, has the owner/operator: 265.119(b)-			
(1) Placed a record in the deed that will in perpetuity notify any potential purchaser of the property that:			
(i) The land was used to manage HW?	—	—	NA
(ii) Its use is restricted under Subpart G?	—	—	
(iii) The required survey plat (265.116) and disposal records (265.119(a)) have been filed?	—	—	
(2) Submitted to the RA a signed, certified copy of the notice and deed?	—	—	

Closure and Post-Closure: - Continued
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Post-closure care:			
Has the specified post-closure contact kept the plan during the post-closure care period? 265.118(b)	---	---	<u>NA</u>
Are all post-closure care activities in the approved plan being performed? 265.117(d)	---	---	
Has the owner/operator, or any subsequent owner of the land, obtained an approved post-closure plan modification before tampering with the HW unit? 265.119(c)	---	---	
At the completion of post-closure care for each unit, did the facility certify to the RA within 60 days that the care was performed in accordance with the post-closure plan's specifications? 265.120	---	---	
Was the certification signed by an independent registered professional engineer? 265.120	---	---	

Financial Requirements:
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the facility owned by the state or federal government? 265.140(c) If YES, Subpart H is not applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cost estimate for closure:			
Has a written estimate been prepared of the cost of closing the facility? 265.142(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
What is the amount of the closure cost estimate?			\$ _____
Does the cost estimate cover all the activities in the closure plan? 265.142(a)-	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(1) Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(2) Is the estimate based on the costs of hiring a third party (not a subsidiary or parent corporation) to close the facility?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Has the estimate not incorporated any salvage values?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Where the HW might have some economic value, was its cost greater than zero?	<input type="checkbox"/>	<input type="checkbox"/>	
Has the cost estimate been adjusted annually and within the required time frames? 265.142(b)	<input type="checkbox"/>	<input type="checkbox"/>	

Financial Requirements: - Continued
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the closure cost adjustment was not made by recalculating the cost in current dollars, was the adjustment made by using an inflation factor*? 265.142(b)	✓	—	_____
Was the cost estimate revised no later than 30 days after a change in the closure plan increased the cost of closure? 265.142(c) (Revised estimate must be adjust for inflation.)		—	_____
Are the latest closure cost estimate and adjusted closure cost estimates kept at the facility during its operating life? 265.142(d)		—	_____
Financial assurance for closure:			
Can the facility indicate they have established and submitted at least one of the following financial assurance mechanisms for closure cost: 265.143-			
(a) Closure trust fund?	✓	—	_____
(b) Surety bond guaranteeing payments into a closure trust fund?		—	_____
(c) Closure letter of credit?		—	_____
(d) Closure insurance?		—	_____
(e) Financial test and corporate guarantee for closure? (The facility may use more than one of the above (265.143(f)), and can be included with another facility (265.143(g)).		—	_____

*Derived from the Annual Implicit Price Deflator for Gross Nation Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business."

Latest Annual Deflator = _____ Previous Annual Deflator = _____
Inflation Factor = _____ (latest deflator/previous deflator)

Current Cost Adjustment = \$ _____ (latest adjusted estimate x inflation factor)

Financial Requirements: - Continued
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Were the financial assurance mechanisms amended as needed to cover the latest revised closure cost estimate? 265.143	✓		
Cost estimate for post-closure:			
Has a written estimate been prepared of the cost of post-closure care? 265.144(a)			NA
What is the amount of the post-closure cost estimate?			\$
Was the estimate calculated by multiplying a detailed estimate of annual costs by 30 years of post-closure care? 265.144(a)(2)			
Does the annual care cost estimate cover all the activities in the post-closure plan? 265.144(a)			
Is the estimate based on the costs of hiring a third party (not a subsidiary or parent corporation) to close the facility? 265.144(a)(1)			
Has the post-closure cost estimate been adjusted annually? 265.144(b)			
If the closure cost adjustment was not made by recalculating the cost in current dollars was the adjustment made by using an inflation factor? 265.144(b)(1-2)			
During the active life of the facility, was the cost estimate revised no later than 30 days after a revision to the post-closure plan increases the cost of post-closure care? 265.144(c)			
(Revised estimate must be adjusted for inflation.)			
Are the latest post-closure cost estimate and adjusted cost estimate kept at the facility during its operating life? 265.144(d)			

Financial Requirements: - Continued
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Financial assurance for post-closure:			
Can the facility indicate they have established and submitted at least one of the following financial assurance mechanisms for post-closure care: 265.145-			
(a) Post closure trust fund?	—	—	NA
(b) Surety bond guaranteeing payment into a post-closure trust fund?	—	—	
(c) Post-closure letter of credit?	—	—	
(d) Post-closure insurance?	—	—	
(e) Financial test and corporate guarantee for post-closure care?	—	—	
(The facility may use more than one of the above (265.145(f)), and can be included with another facility (265.145(g)).			
Were the financial assurance mechanisms amended as needed to cover the latest revised post-closure cost estimate? 265.145	—	—	
If the facility chose to satisfy the requirements for financial assurance for both closure and post-closure care by a single mechanism, did the sum of funds available at least equal what the total would be for separate mechanisms? 265.146	—	—	
Screening for liability requirements:			
Has the facility submitted a demonstration of liability coverage to third parties for sudden accidental occurrences? 265.147(a)	—	—	
Did the sudden accident coverage consist of at least \$1 million per occurrence and \$2 million per year exclusive of legal defense costs? 265.147(a)	—	—	

Financial Requirements: - Continued
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was the sudden accident coverage demonstrated by having: 265.147(a)-			
(1) Liability insurance?	—	—	<u>NA</u>
(2) Financial test or corporate guarantee?	—	—	
(3) Surety bond for liability?	—	—	
(4) Trust fund for liability?	—	—	
(5) A combination of the above?	—	—	
If demonstrated by having liability insurance, was one or both of the following attached: 265.147(a)(1)(i)*			
Hazardous Waste Facility Liability Endorsement?	—	—	
Certificate of Liability Insurance?	—	—	
If the facility operates a HW surface impoundment, landfill, or land treatment facility, have they also submitted a demonstration of liability coverage for non-sudden accidental occurrences? 265.147(b)	—	—	
Did the non-sudden accidental coverage consist of at least \$3 million per occurrence and \$6 million per year? 265.147(b)	—	—	
Was the non-sudden accident coverage demonstrated by having: 265.147(b)-			
(1) Liability insurance?	—	—	
(2) Financial test or corporate guarantee?	—	—	
(3) Letter of credit for liability?	—	—	
(4) Surety bond for liability?	—	—	
(5) Trust fund for liability?	—	—	
(6) A combination of the above?	—	—	

*In CA: DHS 8108: Liability Endorsement. DHS 8107: Liability Certificate of Insurance.

Financial Requirements: - Continued
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If demonstrated by having liability insurance, was one or both of the following attached: 265.147(b)(1)(i)*			
Hazardous Waste Facility Liability Endorsement?	—	—	NA
Certificate of Liability Insurance?	—	—	
If the TSD liability coverage amounts were less than those required, has the facility obtained a variance? 265.147(c)	—	—	
If the owner/operator has been named the debtor in a proceeding under Title 11 (Bankruptcy), U.S. Code, did they notify EPA within 10 Days of the commencement of the proceedings? 265.148	—	—	
If the guarantor or financial institution is incapacitated, has the facility owner/operator established other financial assurance or liability coverage within 60 days? 265.148(b)	—	—	
*In CA: DHS 8108: Liability Endorsement. DHS 8107: Liability Certificate of Insurance.			

Use and Management of Containers:
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility transfer HW from containers not in good condition or leaking to containers in good condition? 265.171	✓	—	_____
Are containers compatible with the HW stored in them? 265.172	✓	—	_____
Are containers stored closed? 265.173(a)	✓	—	_____
Are containers managed to prevent rupture or leakage? 265.173(b)	✓	—	_____
Are containers inspected weekly for leaks and deterioration? 265.174	✓	—	_____
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176	✓	—	_____
Are incompatible wastes stored in separate containers? 265.177(a)	✓	—	_____
Is HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)	✓	—	_____
Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)	✓	—	_____
Are containers or inner liners that are not empty managed as HW? 261.7(a)(2)	✓	—	_____
For a container to be considered empty, the facility must ensure that no more remains than: 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and: ✓ _____			

*TSDs that generate HW also must comply with 262 regs. An Accumulation Areas checklist is attached for field use at multiple-unit facilities. (See Page I3)

Use and Management of Containers: - Continued
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(ii) One inch of residue on bottom of container or inner lining? or:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iii)(A) If the container is not over 110 gallons in size, 3% of weight when full?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:	<input type="checkbox"/>	<input type="checkbox"/>	
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	NA
If a container (or liner removed from the container) has held an acute HW, it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(ii) Cleaned by another proven removal means? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) For the container, the liner prevented contact and has since been removed?	<input type="checkbox"/>	<input type="checkbox"/>	

See also 265.31 (p. C1).

ACCUMULATION AREAS & CONTAINERS

Accumulation if Less than 55 gallons

The generator may accumulate at or near the point of initial generation up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:

The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)

AND

The containers are in good condition
265.171.

AND

The containers are compatible with the waste 265.172.

AND

The containers are stored closed
265.173(a).

AND

The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).

Accumulation if greater than 55 gallons

Are containers visibly marked with:

The date that the waste accumulation started?
262.34(a)(2)

The words "hazardous waste"? 262.34(a)(3)

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).

[illegible]

Page 2 of 3

Does the generator comply with the requirements of 40 CFR Part 265.16 for personnel training in emergency procedures?

[illegible]

Tanks:
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are tanks used to store or treat HW exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	—	—	<u>No Tanks</u>
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	—	—	<u>NA</u>
See also Part 280, underground product tanks. If a 100-1000 kg/mo. generator, see Part 262 checklist.			
Are HW or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	—	—	
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings?	—	—	<u>NA</u>
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?	—	—	
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?	—	—	
Are daily inspections done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems?	—	—	<u>NA</u>
(2) Corrosion or releases of waste in above ground portions?	—	—	
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells?	—	—	

Note: If the primary purpose of this inspection is to evaluate compliance with HW storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(4) Construction materials and area surrounding the tank, including secondary containment (e.g., dikes) for erosion or signs of releases (e.g., wet spots, dead vegetation)?	—	—	NA
Are sources of impressed current inspected at least every other month? 265.195(b)(2)	—	—	
Are cathodic protection systems inspected six months after initial installation and then annually? 265.195(b)(1)	—	—	
If a leak has occurred in the tank system, has the facility complied with 265.196 (p. J9)? 265.194(c)	—	—	
Ignitable and reactive waste:			
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.198(a)(1)(i-ii) or:	—	—	
Is ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.198(a)(2) or:	—	—	
Is the tank used solely for emergencies? 265.198(a)(3)	—	—	
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in table 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.198(b)	—	—	
Are incompatible wastes stored in separate tanks? 265.199(a)	—	—	

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is HW not placed in non-decontaminated tanks that previously held an incompatible waste or material? 265.199(b)	—	—	<u>NA</u>
Whenever a tank system is to be used to chemically treat or store a HW which is substantially different from waste previously handled in the tank, or chemically treat HW with a substantially different process than was previously used, did the facility: 265.200-			
(a) Conduct waste analysis and trial treatment or storage tests (bench-tests)? or:	—	—	
(b) Have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions?	—	—	
Construction, containment, and assessment:			
Was the tank system or component used to treat HW installed after 7/14/86?	—	—	
If YES, go to 265.192, new tank systems (next page).			
If an existing tank system (installation commenced or committed before 7/14/86) with a secondary HW containment system, go to 265.193 (p. J6)	—	—	
If an existing tank system without complying secondary containment, has the facility determined whether the tank system is either not leaking or unfit for use? 265.191(a)	—	—	
If found to be leaking or unfit for use, has the facility complied with 265.196 (p. J9)? 265.191(d)	—	—	
If fit for use, has the facility obtained a written assessment that attests to the tank system's integrity by 1/12/88*? 265.191(a)	—	—	
* Or within 12 months after their waste is listed as HW. 265.191(c)			

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was the assessment on file at the facility, and certified by an independent, registered professional engineer? 265.191(a)	___	___	N/A
Did the assessment consider: 265.191(b)-			
(1) Original blueprints and standards?	___	___	
(2) HW characteristics?	___	___	
(3) Existing corrosion protection measures?	___	___	
(4) Documented age of tank, if known?	___	___	
(5) Leak test, internal inspection, or integrity test results?	___	___	
Design and installation of new tank systems:			
Does the facility have a tank system or component that is used to treat or store HW and was installed after 7/14/86?	___	___	
Has the facility obtained an assessment certified by an independent, registered, professional engineer attesting that the tank or component design is acceptable? 265.192(a)	___	___	
Did the assessment include: 265.192(a)-			
(1) Construction and design standards?	___	___	
(2) Hazardous characteristics of the wastes to be handled?	___	___	
(3) Corrosion? (see next page)	___	___	
(4) Protection against vehicular traffic?	___	___	
(5)(i) Strength of the foundation?	___	___	
(5)(ii) Anchoring to prevent flotation or dislodgement?	___	___	
(5)(iii) Effects of frost heave?	___	___	
Are certifications on file to attest that the installation steps and inspections, and any required repairs, were properly performed? 265.192(g)	___	___	

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the installation include before-use inspection and repair of any: 265.192(b) -			N/A
(1) Weld breaks?	—	—	
(2) Punctures?	—	—	
(3) Scrapes of protective coating?	—	—	
(4) Cracks?	—	—	
(5) Corrosion?	—	—	
(6) Other damage or inadequacies?	—	—	
Was the proper backfilling of underground tanks or components certified? 265.192(c)	—	—	
Were all tanks tested (and repaired) for tightness? 265.192(d)	—	—	
Were ancillary equipment certifiably supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, and contraction? 265.192(e)	—	—	
New tank corrosion certification:			
Where the external shell of a metal tank or any metal component touches soil or water, was the tank design and installation supervised and certified by a corrosion expert? 265.192(a)(3)	—	—	
Did the corrosion certification consider these factors: 265.192(a)(3)(i) -			
(A) Soil moisture content?	—	—	
(B) Soil pH?	—	—	
(C) Soil sulfides level?	—	—	
(D) Soil resistivity?	—	—	
(E) Structure to soil potential?	—	—	
(F) Influence of nearby underground metal structures or piping?	—	—	
(G) Stray electric current?	—	—	

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(H) Existing corrosion-protection measures (coating, cathodic protection, etc.)?	—	—	<u>NA</u>
Was at least one of the following used to ensure tank integrity: 265.192(a)(3)(ii)-			
(A) Corrosion-resistant constructions materials such as special alloys fiberglass-reinforced plastic, etc.?	—	—	
(B) Corrosion-resistant coatings such as epoxy or fiberglass?	—	—	
(C) Electrical isolation devices such as insulating joints, flanges, etc.?	—	—	
Was a secondary containment system provided for any: 265.193(a)-			
(1) New tank systems or components before installation?	—	—	
(2) Existing tanks used to treat or store F020, F021, F022, F023, F026, F027, by 1/12/89?	—	—	
(3) Existing tanks of proven age, by the later of 1/12/89 or 15 years old?	—	—	
(4) Existing tanks of undocumented age, by 1/12/95, or if the facility was built before 1980, by the later of 1/12/89 or the facility reaching 15 years of age?	—	—	
(5) Tank systems that handled materials that became hazardous wastes after 1/12/87, within two years of regulation or the facility reaching 15 years of age?	—	—	
If NO, to any of the above, has a variance been obtained from the RA?	—	—	
265.193(g)			

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are the containment systems: 265.193(b)-			
(1) Designed, installed, and operated to prevent any releases to soil or water at any time during operation? and:	—	—	NA
(2) Capable of detecting, collecting, and holding releases from the tank?	—	—	
To meet these requirements, are the containment systems: 265.193(c)-			
(1) Compatible with wastes handled, and strong enough to prevent failure due to pressure (including ground water), weather, installation, or daily operations?	—	—	
(2) Placed on a foundation that withstands settlement, compression, or uplift?	—	—	
(3) Provided with a leak detection system that detects any releases within 24 hours (if possible)?	—	—	
(4) Sloped or drained to remove all liquids within 24 hours (if possible)?	—	—	
Does the secondary containment for tanks include one of these devices: 265.193(d)-			
(1) A liner external to the tank?	—	—	
(2) A vault?	—	—	
(3) A double-walled tank? or:	—	—	
(4) An equivalent approved by the RA?	—	—	
If an external liner is used, does it: 265.193(e)(1)-			
(i) Contain 100% of the largest tank volume?	—	—	
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	—	—	
(iii) Be free of cracks or gaps?	—	—	
(iv) Capable of preventing lateral and vertical migration of waste?	—	—	

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If a vault system is used, does it: 265.193(e)(2)-			
(i) Contain 100% of the largest tank volume?	—	—	NA
(ii) Either prevent run-off or rain from entering, or have added capacity to contain a 25-year, 24-hours storm?	—	—	
(iii) Have any joints sealed?	—	—	
(iv) Have an impermeable liner or coating over the concrete?	—	—	
(v) Protect against vapor formation from ignitable or reactive wastes?	—	—	
(vi) Have an exterior moisture barrier to prevent seep-in?	—	—	
If a double-walled tank is used, is it: 265.193(e)(3)-			
(i) One integral structure?	—	—	
(ii) Protected from interior and exterior corrosion?	—	—	
(iii) Provided with a leak detection system capable of detecting a leak within 24 hours (if possible)?	—	—	
Is all ancillary equipment provided with full secondary containment e.g., trench, jacketing, double-walled pipe (except for the following <u>if</u> inspected daily for leaks): 265.193(f)-			
(1) Above ground pipes?	—	—	
(2) Welded flanges, joints, and connections?	—	—	
(3) Seal-less or magnetic coupling pumps?	—	—	
(4) Pressurized above ground piping systems with automatic shut-off devices?	—	—	
Leaks, spills, unfit-for-use tanks:			
If a tank system or secondary containment system has had a leak or spill, or is unfit for use, was it immediately removed from service? 265.196	—	—	
Did the facility immediately stop the flow of HW into the system, and inspect to determine the cause of the release? 265.196(a)	—	—	

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the release was from the tank system, within 24 hours of detection (if possible) did they remove enough waste to prevent further release and allow inspection and repair? 265.196(b)	—	—	NA
If the release was to a secondary containment system, were all released materials removed in 24 hours? 265.196(b)(2)	—	—	
If the release was to the environment, did the facility immediately conduct a visual inspection of the release? 265.196(c)- and:	—	—	
(1) Contain it to prevent further migration to soils or surface water?	—	—	
(2) Remove and properly dispose of any visible contamination of the soil or surface water?	—	—	
Was the leak or spill of HW: 265.196(d)(2)-			
(i) Less than or equal to one pound?	—	—	
and,	—	—	
(ii) Immediately contained and cleaned up?	—	—	
If not, was the spill or leak reported to the RA within 24 hours? 265.196(d)(1)	—	—	
If the reportable leak was a release to the environment, was a full report submitted to the RA within 30 days of detection? 265.196(d)(3)	—	—	
Did the environmental release report include: 265.196(d)(3)-			
(i) Likely route of migration?	—	—	
(ii) Characteristics of the surrounding soil composition, geology, hydro-geology, and climate?	—	—	
(iii) Results of any monitoring or sampling? (See next page for continued question)	—	—	

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If not, were the results forwarded to the RA as soon as the analysis was received?			NA
(iv) Proximity to downgradient drinking water, surface water, and population areas?			
(v) A description of response actions taken or planned?			
Repair, containment, or closure:			
If the cause of the release was a spill that did not damage the integrity of the system was waste removed and necessary repairs made before returning the system to service? 265.196(e)(2)			
If the cause of the release was a leak from the primary tank system into the secondary tank system, was the system repaired before returning to service? 265.196(e)(3)			
If the source of any leak to the environment was from an aboveground, visually accessible component, was it repaired and certified before being returned to service? 265.196(e)(4)			
If the source of any leak to the environment was from a component or tank without secondary containment, and was below ground (or above ground but not readily accessible for visual inspection, e.g., the bottom of an onground tank), was the tank or entire component provided with secondary containment (265.193, p. J6) before being returned to service? 265.196(e)(4)			
If the answer to any of the above four questions was NO, did the facility close the unit in accordance with 265.197 (p. J11)? 265.196(e)(1)			

Tanks: - Continued
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the facility has extensively repaired a tank system that leaked, was the repaired system certified capable by an independent, registered professional engineer? 265.196(f)	—	—	NA
Was the certification submitted to the RA within 7 days after returning the system to use? 265.196(f)	—	—	
If a tank system or component was replaced, did it comply with 265.192, new tanks (p. J4)? 265.196(e)(4)	—	—	
Tank closure and post-closure care:			
At closure, did the facility remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), structures, soil, and equipment? 265.197(a)	—	—	
If the facility demonstrated that all contaminated soils cannot be removed or decontaminated, did they close the tank and perform post-closure care as if a landfill? 265.197(b)	—	—	
If the facility has a tank system without complying secondary containment or an exemption, did they include contingent closure and post-closure plans covering the care and reporting provisions for landfills? 265.197(c)(1-2)	—	—	
Did they include the contingent plans in the cost estimate? 265.197(c)(3)	—	—	
Did they include the contingent plans' costs in the financial assurance and responsibility estimates? 265.197(c)(4-5)	—	—	

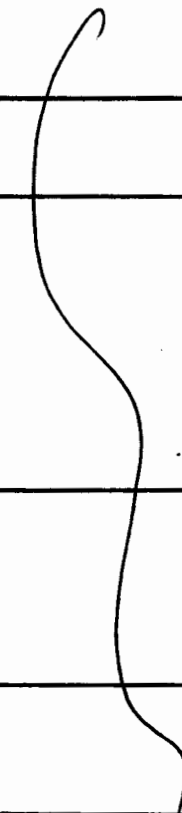
See also Subparts G, H.

Generators of Between 100 and 1000 kg/month That Accumulate HW in Tanks:
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For HW generators of between 100 and 1000 kilograms that accumulate in tanks for less than 180 days*, and do accumulate more than 6000 kg on-site at any time: 265.210(b)-			
(1) Does treatment or storage of HW in tanks comply with 265.17(b)?	—	—	N/A
(2) Are HW or treatment reagents not placed in a tank if they could cause the tank or inner liner to fail?	—	—	
(3) Do uncovered tanks have at least 2 feet (60 centimeters) of freeboard, or overflow containment capacity equal to the volume of the top 2 feet?	—	—	
(4) Where HW is continuously fed into a tank, is there a means to stop inflow?	—	—	
Does the 100-1000 kg/mo. generator inspect: 265.201(c)-			
(1) Discharge control equipment (waste feed cut-off and by-pass systems, drainage systems) daily?	—	—	
(2) Data from monitoring equipment (pressured and temperature gauges) daily?	—	—	
(3) Waste levels in tanks daily?	—	—	
(4) Tank construction materials for corrosion or leaking fixtures and seams weekly?	—	—	
(5) Construction materials and area surrounding the tank including secondary containment (dikes) for erosion or signs of releases (wet spots, dead vegetation) weekly?	—	—	

*Or 270 days if they must ship the waste over 200 miles.

Generators of Between 100 and 1000 kg/month That Accumulate HW in Tanks:
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are ignitable or reactive waste not placed in a tank, unless: 265.201(e)(1)-			
(i) The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? or:	—	—	NA
(ii) The waste is stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? or:	—	—	
(iii) The tank is used solely for emergencies?	—	—	
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.201(e)(2)	—	—	
Unless 265.17(b) is complied with: 265.201(f)-			
(1) Are incompatible wastes stored in separate tanks?	—	—	
(2) Is HW not placed in unwashed tanks that previously held an incompatible waste or material?	—	—	

Surface Impoundments:
(Part 265 Subpart K)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the facility installed two or more liners and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received HW after 5/8/85? 265.221(a) or:	_____	_____	NA
Has the RA approved a waiver? 265.221(c-d)	_____	_____	_____
For existing interim status HW surface impoundments not covered above, did the facility retrofit the impoundment by 11/8/88? HSWA 3005(j)(1) or:	_____	_____	_____
Did the facility cease accepting HW by 11/8/88* and submit a closure plan? HSWA 3005(j)	_____	_____	_____
If the facility did install double liners and a leachate collection system, did the facility notify the RA at least 60 days prior to receiving waste in the impoundment? 265.221(b) and:	_____	_____	_____
Within six months of submitting this notice, file a Part B application? 265.221(b)	_____	_____	_____
Do impoundments have at least two feet of freeboard? 265.222(a); or	_____	_____	_____
Does the facility have on site an engineer's certification stating what alternative design features prevent overtopping of the dike? 265.222(b)	_____	_____	_____
Is the freeboard level inspected at least daily? 265.226(a)	_____	_____	_____
Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity? 265.223	_____	_____	_____

*The facility may continue to treat in surface impoundments waste in place before 11/8/88, and may place wastes removed for retrofitting or closure activities back into the same impoundment they were removed from.

Surface Impoundments: - Continued
(Part 265 Subpart K)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the impoundment, including dikes and surrounding vegetation, inspected weekly to detect leaks, deterioration, or failure? 265.226(b)	—	—	NA
Before an impoundment is used to chemically treat a HW which is substantially different from waste previously treated in that impoundment, or chemically treat HW with a substantially different process than was previously used, did the facility: 265.225(a)(1-2)			
(i) Conduct waste analysis and trial treatment test (bench or pilot plant scale)? or:	—	—	
(ii) Obtain written documentation on similar treatment of similar waste under similar operating conditions?	—	—	
Are incompatible wastes or materials (Appendix V) not placed in the same impoundment unless 265.17(b) is complied with? 265.230	—	—	
Are ignitable or reactive wastes treated, rendered or mixed, before or immediately after placement in the impoundment, so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitability or reactivity? 265.229(a)(1-2) or:	—	—	
A signed certification by a chemist or engineer is kept on site that the waste is handled in such a way that it is protected from conditions that may cause the waste to ignite or react? 265.229(b)(1-3) or:	—	—	
Is the impoundment used solely for emergencies? 265.229(c)	—	—	

NOTE: Additional surface impoundment operating, record keeping, and waste analysis requirements are detailed in the Part 268: Land Disposal Restrictions checklist.

LDR wastes removed during closure or retrofitting are considered newly generated unless wastes are returned to the same impoundment from which they were removed. Otherwise, any LDR effective dates apply.

Surface Impoundments: - Continued
(Part 265 Subpart K)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
At closure, has the facility removed or decontaminated, and managed as a HW all: 265.228(a)(1)			
Waste residues?	—	—	
Containment system components?	—	—	
Contaminated subsoils?	—	—	
Structures and equipment contaminated with waste and leachate?	—	—	
Has the facility closed the impoundment and managed it like a landfill (under Subpart G and 265.310) including: 265.228(a)(2)-			
(i) Eliminating free liquids by removing wastes or solidifying the remaining wastes and residues?	—	—	
(ii) Stabilized remaining wastes to a bearing capacity sufficient to support the final cover?	—	—	
Has the facility installed a final cover that: 265.228(a)(2)(iii)-			
(A) Provides long-term minimization of liquid migration?	—	—	
(B) Functions with minimum maintenance?	—	—	
(C) Promotes drainage and minimizes erosion or abrasion of the cover?	—	—	
(D) Accommodates settling and subsidence to maintain cover integrity?	—	—	
(E) Has a permeability less than or equal to the bottom liner or natural subsoils?	—	—	
Where wastes, waste residues, or contaminated material remain after closure, during post-closure care (in addition to Subpart G and 265.310 requirements) has the facility: 265.228(b)-			
(1) Maintained the integrity and effectiveness of the final cover, and made repairs as necessary?	—	—	
(2) Maintained and monitored the ground water monitoring system (and complied with all other applicable Subpart F requirements)?	—	—	
(3) Prevented run-on and run-off from eroding or damaging the final cover?	—	—	

Waste Piles:
(Part 265 Subpart L)

None

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are waste piles covered or protected from dispersal by wind? 265.251	—	—	<u>N/A</u>
Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile? <u>unless:</u> 265.252	—	—	
(1) All pile-able wastes the facility receives are compatible? or: (2) The waste received is compatible with the waste already in a pile?	—	—	
Is the analysis adequate to avoid inadvertent mixing of incompatibles in piles? 265.252	—	—	
Does the analysis include a visual comparison of color and texture? 265.252	—	—	
For waste piles where the leachate or run-off from the pile is a HW: 265.253(a)-			
(1) Is the pile placed on an impermeable base that is compatible with the waste?	—	—	
(2) Is there a run-on control system capable of handling a 25-year storm?	—	—	
(3) A run-off control system capable of handling a 24-hour, 25-year storm?	—	—	
(4) Are collection and holding units (tanks and basins) for run-on and run-off promptly emptied or managed to maintain design capacity?	—	—	
If NO to (1)-(4) above, is: 265.253(b)-	—	—	
(1) The pile protected from precipitation and run-on by some other means (roof)? and:	—	—	
(2) Are no liquids, or wastes containing free liquids, placed in the pile?	—	—	
Has the facility installed a liner and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received waste after 5/8/85? 265.254	—	—	

Waste Piles:- Continued
(Part 265 Subpart L)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For facilities that add ignitable or reactive wastes to an existing pile, can they demonstrate that: 265.256(a)-			
(1) The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause uncontrolled ignition or reaction? or:	—	—	<u>NA</u>
(2) The waste is protected from materials or conditions that might cause them to ignite or react?	—	—	
Does the facility ensure that incompatible wastes and material are not placed in the same waste pile unless 165.17(b) is complied with? 265.257(a)	—	—	
Are piles of HW that are incompatible with materials stored nearby separated by sufficient distance or protected by some structural device, e.g., a dike, wall or berm? 265.257(b)	—	—	
Are HW not placed on the same area where incompatible wastes were previously piled, unless the area has been sufficiently decontaminated? 265.257(c)	—	—	
At closure, has the facility removed or decontaminated, and managed as HW, all: 265.258(a)			
Waste residues?	—	—	
Contaminated containment system components?	—	—	
Contaminated subsoils?	—	—	
Structures and equipment contaminated with waste and leachate?	—	—	
If NO, has closure and post-closure care as a landfill been performed? 265.258(b)	—	—	

Land Treatment:
(Part 265 Subpart M)

None

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the HW treated in the land treatment unit capable of biological or chemical degradation? 265.272(a)	—	—	NA
Is there a run-on control system designed, constructed, operated, and maintained to keep flow off the active portions of the facility during peak discharge from at least a 25-year storm? 265.272(b)	—	—	
Is there a run-off management system designed, constructed, operated, and maintained to collect and control a volume of water at least equivalent to a 24-hour, 25-year storm? 265.272(c)	—	—	
Are collection and holding facilities associated with run-on and run-off control systems managed to maintain the design capacity of the system? 265.272(d)	—	—	
Is the treatment zone managed to control particulate wind dispersal? 265.272(e)	—	—	
Before placing HW in or on a land treatment unit, has the facility determined the following: 265.273-			
(a) Concentrations in the waste of any substance that cause a waste to exhibit the EP toxicity characteristic?	—	—	
(b) For any waste listed in Part 261, Subpart D, the concentration of any substance which caused the waste to be listed as a HW?	—	—	
(c) If food chain crops are grown (see 265.276, p. M3), the concentrations in the waste of arsenic, cadmium, lead, and mercury unless written, documented data shows that the constituent is not present?	—	—	
Unsaturated Zone Monitoring:			
Has the facility implemented an unsaturated zone monitoring plan? 265.278(a)	—	—	

Land Treatment: - Continued
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the plan and the rationale used to develop the plan kept at the facility? 265.278(d)	<input type="checkbox"/>	<input type="checkbox"/>	NA
Is the plan designed to detect vertical migration of HW and HW constituents under active portions of the land treatment unit? 265.278(a)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan provide information on the background concentrations of HW and HW constituents in similar but untreated soils nearby? 265.278(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Is the background monitoring conducted before or in conjunction with the migration monitoring? 265.278(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan include: 265.278(b)-			
(1) Soil monitoring using soil cores?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Soil-pore water monitoring using devices such as lysimeters?	<input type="checkbox"/>	<input type="checkbox"/>	
Has the facility demonstrated in their unsaturated zone monitoring plan that: 265.278(c)-			
(1) The depth at which soil and soil-pore water samples are taken is below the depth to which the waste is incorporated into the soil?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) The number of soil and soil-pore water samples to be taken is based on the variability of the HW constituents in the waste and in the soil, and the soil type(s)?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) The frequency and timing of soil and soil-pore water sampling is based on the frequency, time, and rate of waste application, proximity to ground water, and soil permeability?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the facility analyze the soil and soil-pore water samples for the same HW constituents that were found during the waste analysis? 265.278(e)	<input type="checkbox"/>	<input type="checkbox"/>	

Land Treatment: - Continued
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are records kept regarding application dates and rates, quantities, and locations of all HW placed in the land treatment unit? 265.279	—	—	NA
Are ignitable or reactive wastes immediately incorporated into the soil so that the resulting waste mixture no longer meets the definition of ignitable or reactive waste, and 265.17(b) is complied with? 265.281(a)(1-2) or:	—	—	
The waste is managed in such a way that it is protected from conditions which may cause it to ignite or react? 265.281(b)	—	—	
Does the facility ensure that incompatible wastes are not placed in the same unit, unless 265.17(b) is complied with? 265.282	—	—	
Food chain crops:			
Has the facility notified the RA of any land treatment units on which food chain crops are or will be grown? 276.276(a)	—	—	
Has the facility conducted field tests before food chain crops are grown on the treated area that demonstrate any arsenic, lead, mercury, or listed HW constituents? 265.276(b)(1)-	—	—	
(i) Will not be transferred to the food portion of the crop by plant uptake or direct contact, and will not be ingested by food chain animals (e.g. by grazing)? or:	—	—	
(ii) Will not occur in greater concentrations in the crops grown on the land treatment field than in crops grown on untreated soils?	—	—	
Are these test results kept at the facility?	—	—	

Land Treatment: - Continued
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the test results include: 265.275(b)(2)-			
(i) Evidence basing the tests on the specific waste and application rates being used at the facility?	—	—	NA
(ii) Descriptions of crop and soil characteristics, sample selection criteria, sample size determination, analytical and statistical procedures?	—	—	
If food chain crops are grown on a land treatment facility that receives waste containing cadmium, has the facility complied with the requirements of either 265.276(c)(1) or -(2)? 265.276(c)	—	—	
Closure and Post-Closure:			
Does the closure plan and post-closure plan address the following objectives and indicate how they will be achieved: 265.280(a)-			
(1) Control of migration of HW and HW constituents from the treatment zone into the ground water?	—	—	
(2) Control of the release of contaminated run-off from the unit into surface water?	—	—	
(3) Control of the release of airborne particulate contaminants caused by wind erosion?	—	—	
(4) Compliance with 265.276 (growth of food chain crops)?	—	—	
Were the following factors considered in addressing the closure and post-closure care objectives: 265.280(b)-			
(1) Type and amount of HW and HW constituents applied to the land treatment unit?	—	—	
(2) Mobility and expected rate of migration of HW and HW constituents?	—	—	

Land Treatment: - Continued
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(3) Site location, topography, and surrounding land use with respect to the potential effects of pollutant migration (e.g., proximity to ground water, surface water, and drinking water sources)?	—	—	NA
(4) Climate, including amount, frequency and pH of precipitation?	—	—	
(5) Geological and soil profiles; surface and subsurface hydrology of the site; soil characteristics, including cation exchange capacity, total organic carbon, and pH?	—	—	
(6) Unsaturated zone monitoring information?	—	—	
(7) Type, concentration, and depth of migration of HW constituents in the soil as compared to their background concentrations?	—	—	
Did the closure and post-closure care plan include considerations for removal of contaminated soil? 265.280(c)(1)	—	—	
Did the closure and post-closure care plan include considerations for the placement of the final cover? 265.280(c)(2)- including:	—	—	
(i) Functions of the cover (e.g., infiltration control, erosion and run-off control, and wind erosion control)?	—	—	
(ii) Characteristics of the cover, including material, final surface contours, thickness, porosity and permeability, slope, length of run of slope and type of vegetation on the cover?	—	—	
Do the plans address ground water monitoring? 265.280(c)(3)	—	—	

Land Treatment: - Continued
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the closure plan provide for the following during the closure period: 265.280(d)-			
(1) Continuation of the unsaturated zone monitoring program (soil-pore liquid monitoring may be terminated 90 days after the last application of waste)?	—	—	NA
(2) Maintenance of run-on control systems?	—	—	
(3) Maintenance of the run-off management systems?	—	—	
(4) Controlling wind dispersal of particulates?	—	—	
At closure, has the facility submitted to the RA a certification signed by the owner/operator and an independent soil scientist or registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan? 265.280(e)	—	—	
Does the post-closure plan provide for the following during the post-closure care period: 265.280(f)-			
(1) Continuation of the soil-core monitoring program?	—	—	
(2) Restricting access to the unit as appropriate?	—	—	
(3) Assuring that growth of food chain crops complies with 265.276?	—	—	
(4) Controlling wind dispersal of HW?	—	—	

Landfills:
(Part 265 Subpart N)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the facility installed two or more liners and leachate collections systems above and between the liners for each new unit, replacement unit, or lateral expansion of an existing unit that has received waste after 5/8/85? 265.301(a) or:	—	—	NA
Has the RA approved a waiver? 265.301(c-d)	—	—	
If the facility did install double liners and leachate collections systems, did the facility notify the RA at least 60 days prior to receiving waste in the landfill? 265.301(b)	—	—	
Within six months of submitting this notice, did the facility then file a Part B application? 265.301(b)	—	—	
Is the run-on control system capable of preventing flow onto active portions during peak discharge from a 25-year storm? 265.302(a)	—	—	
Is the run-off management system capable of collecting and controlling the water volume resulting from a 24-hour, 25-year storm? 265.302(b)	—	—	
After storms are the run-on and run-off control systems returned to their design capacities? 265.302(c)	—	—	
Are HW managed to prevent wind dispersal? 265.302(d)	—	—	
Does the facility maintain the following items in the operating record: 265.309-			
(a) On a map, the exact locations, dimensions and depth of each cell with respect to permanently surveyed benchmarks?	—	—	
(b) The contents of each cell and the location of each HW type within each cell?	—	—	

Landfills: - Continued
(Part 265 Subpart N)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are incompatible wastes and materials not placed in the same landfill cell unless 265.17(b) is complied with? 265.313	_____	_____	<u>NA</u>
 Requirements For Ignitable or Reactive Wastes:			
Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste, mixture, dissolution, or material no longer exhibits the characteristics of ignitability or reactivity, and 265.17(b) is complied with? 265.312(a)	_____	_____	
 Requirements for Ignitable Wastes Disposed of in Containers: 265.312(b)			
Are wastes protected from materials or conditions which may cause them to ignite?	_____	_____	
Are wastes disposed of in non-leaking containers?	_____	_____	
Are wastes carefully handled and placed so as to avoid heat or sparks?	_____	_____	
Are wastes covered daily with soil?	_____	_____	
Are wastes not disposed in cells that contain other wastes which may generate heat and cause ignition?	_____	_____	
 For facilities that accept bulk liquid HW or waste containing free liquids between 11/19/81 and 5/8/85, did: 265.314(a)-			
(1) The landfill have a complying liner and leachate collection and removal system? or:	_____	_____	
(2) Before disposal, were the liquids treated or stabilized, chemically or physically (mixed with absorbents, etc.), so that free liquids were no longer present?	_____	_____	

Landfills: - Continued
(Part 265 Subpart N)

None

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Have no bulk or containerized HWs containing free liquids (even if mixed with absorbents) been placed in the landfill after 5/8/85? 265.314(b)	—	—	<i>N/A</i>
Have no liquids, even if not a HW, been placed in a landfill after 11/8/85, unless the RA has granted an exemption? 265.314(f)	—	—	<i>[Vertical line]</i>
For landfills that accepted liquids in containers after 3/22/82, was all free-standing liquid handled by one of the following means prior to disposal: 265.314(c)-			
(1)(i) Removed by decanting?	—	—	
(1)(ii) Eliminated, by mixing with absorbent or solidification?	—	—	
(1)(iii) Otherwise eliminated?	—	—	
(2) Contained in an ampule or other very small container?	—	—	
(3) Held in a container designed to hold free liquids for use other than storage, such as a battery or capacitor?	—	—	
(4) In a labpack? (see also next page)	—	—	
Was the paint filter test (Method 9095, SW-846) used to make any determinations of free liquids? 265.314(d)	—	—	
Unless very small (such as an ampule), were containers either: 265.315-			
(a) At least 90% full when buried? or:	—	—	
(b) Crushed flat, shredded, or similarly reduced in volume before they are buried in the landfill?	—	—	

Landfills: - Continued
(Part 265 Subpart N)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are labpacks placed in the landfill: 265.316-			
(a) Packaged in inside containers that are:			
Non-leaking?	___	___	
Compatible with the waste?	___	___	
Securely sealed?	___	___	
In compliance with any DOT specs?	___	___	
(b) Overpacked in an open head DOT spec metal drum of 110 G or less?	___	___	
Surrounded with a sufficient quantity of absorbent material to completely absorb all liquid contents?	___	___	
Packed with absorbent until the overpack drum is full?	___	___	
(c) Contain absorbent material that is compatible with the waste?	___	___	
(d) Not contain incompatible wastes placed in the same drum?	___	___	
Are reactive wastes, other than cyanide- or sulfide-bearing wastes, treated or rendered non-reactive prior to placement in labpacks? 265.316(e)	___	___	
Closure and Post-Closure:			
At final closure of the landfill or any cell, has a final cover been placed over the unit that is designed to: 265.310(a)-			
(1) Provide long-term minimization of migration of liquids through the closed landfill?	___	___	
(2) Function with minimum maintenance?	___	___	
(3) Promote drainage and prevent erosion or abrasion of the cover?	___	___	

NA

Landfills: - Continued
(Part 265 Subpart N)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(4) Accommodate settling and subsidence to maintain the cover's integrity?	—	—	NA
(5) Have a permeability less than or equal to that of the bottom liner or natural subsoils?	—	—	
During post-closure, has the facility: 265.310(b)-			
(1) Maintained the integrity and effectiveness of the final cover, and made repairs as necessary?	—	—	
(2) Maintained and monitored the ground water monitoring system (and complied with all other applicable Subpart F requirements)?	—	—	
(3) Prevented run-on and run-off from eroding or damaging the final cover?	—	—	
(4) Protected and maintained surveyed benchmarks?	—	—	
See also land-disposal facility closure requirements, Subparts G and H.			

Incinerators:
(Part 265 Subpart O)

None

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility operate a HW incinerator*? 265.340(a)(1-2)	—	—	<i>NA</i>
Has the facility documented that no wastes expected to contain Appendix VIII constituents are burned? <u>and</u> : 265.340(b)	—	—	
Is documentation on site that the waste is listed as a HW solely because it is: 265.340(b)-			
(1) Ignitable and/or corrosive (Subpart D, Hazard Code I or C)?	—	—	
(2) Reactive (Code R), does not emit toxic fumes, and will not be burned along with any other HW?	—	—	
(3) Has ignitable and/or corrosive characteristics (Subpart C)?	—	—	
(4) Has a reactive characteristic (Subpart C) and is handled per Code R above?	—	—	
If YES to the previous two questions, the facility is exempt from Subpart O. See also 266, Subparts D and E.			
Does the facility conduct waste analysis for each new waste sufficient to enable them to establish necessary steady state conditions and what pollutants might be emitted? 265.341	—	—	
Does the waste analysis consider: 265.341-			
(a) Heating value?	—	—	
(b) Halogen and sulfur content?	—	—	
(c) Concentrations of lead and mercury, unless written documentation show they are not present?	—	—	
Is waste not fed to the incinerator during start-up and shut-down unless the incinerator has reached steady state conditions? 265.345	—	—	

*An incinerator is an enclosed device using controlled flame combustion; an industrial boiler or furnace used to destroy wastes by burning; or an industrial furnace for any recycling purpose that elects to be regulated under this subpart.

Incinerators:- Continued
(Part 265 Subpart O)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility monitor existing temperature and emission control devices every <u>15 minutes</u> of operation, including those measured in: 265.347(a)			NA
Waste feed?	___	___	_____
Auxiliary fuel feed?	___	___	_____
Air flow?	___	___	_____
Incinerator temperature?	___	___	_____
Scrubber flow and pH?	___	___	_____
Process flow and level controls?	___	___	_____
Were appropriate corrections to maintain appropriate steady state conditions made immediately? 265.347(a)	___	___	_____
Is the complete unit, including pumps, valves, conveyors, pipes, emergency shut-down controls, system alarms etc., inspected daily for leaks, spills, and fugitive emissions? 265.347(b)	___	___	_____
Has the facility received performance certification from the EPA before incinerating: 265.352	___	___	_____
F020: tri- or tetrachlorophenol?	___	___	_____
F021: pentachlorophenol?	___	___	_____
F022: tetra-, penta-, or hexachlorobenzenes (alkaline conditions)?	___	___	_____
F023: wastes from F020 equipment?	___	___	_____
F026: wastes from F022 equipment?	___	___	_____
F027: discarded unused formulations of tri-, tetra-, or pentachlorophenol and derivatives?	___	___	_____
At closure, was all HW and HW residues, including ash, removed from the equipment? 265.351	___	___	_____

Other Thermal Treatment:
(Part 265 Subpart P)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility thermally treat HW in devices other than incinerators? (If "an enclosed device using controlled flame combustion", the unit is an incinerator.) 265.370	—	—	NA
If the device is a batch treatment unit, is a complete thermal cycle used to treat each batch of HW? 265.373	—	—	
If not a batch process, does the facility bring the unit up to steady state (normal) operating temperature and conditions before adding HW? 265.373	—	—	
• Does the facility conduct waste analysis for each new waste sufficient to enable them to establish necessary steady state conditions and what pollutants might be emitted? 265.375	—	—	
Does the waste analysis consider: 265.375-			
(a) Heating value?	—	—	
(b) Halogen and sulfur content?	—	—	
(c) Concentrations of lead and mercury, unless written documentation shows they are not present?	—	—	
Does the facility monitor existing temperature and emission control devices every <u>15 minutes</u> of operation, including those measuring: 265.377(a)(1)			
Waste feed?	—	—	
Auxiliary fuel feed?	—	—	
Treatment process temperature?	—	—	
Process flow and level controls?	—	—	
Were any corrections to maintain appropriate steady state conditions made immediately? 265.377(a)(1)	—	—	
Is the stack plume observed <u>hourly</u> for normal color and opacity, and any corrections made immediately? 265.377(a)(2)	—	—	

Other Thermal Treatment: - Continued
(Part 265 Subpart P)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the complete unit, including pumps, valves, conveyors, pipes, emergency shut-down controls, systems alarms etc., inspected <u>daily</u> for leaks, spills, and fugitive emissions? 265.377(a)(3)	—	—	<u>NA</u>
Has the facility received performance certification from the EPA before thermally treating: 265.383	—	—	
F020: tri- or tetrachlorophenol?	—	—	
F021: pentachlorophenol?	—	—	
F022: tetra-, penta-, or hexachlorobenzenes (alkaline conditions)?	—	—	
F023: wastes from F020 equipment?	—	—	
F026: wastes from F022 equipment?	—	—	
F027: discarded unused formulations of tri-, tetra-, or pentachlorophenol and derivatives?	—	—	
At closure, was all HW and HW residues, including ash, removed from the equipment? 265.381	—	—	
Open burning of HW explosives:			
Does the facility open burn or detonate <u>only</u> waste explosives or military propellants? 265.382	—	—	
Do they comply with the following minimum specifications? 265.382	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
0 to 100	670 feet (204 meters)
101 to 1,000	1,250 feet (360 meters)
1,001 to 10,000	1,730 feet (530 meters) (5280 feet -
10,001 to 30,000	2,260 feet (690 meters) one mile)

Chemical, Physical, and Biological Treatment:

(Part 265 Subpart Q)

None

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility treat HW by chemical, physical, or biological methods other than in tanks, surface impoundments, or land treatment facilities? 265.400	___	___	<i>NA</i>
Does the treatment comply with 265.17(b)? 265.401(a)	___	___	
Are HW or treatment reagents not placed in the unit if they could cause the equipment to rupture, leak, corrode, or otherwise fail? 265.401(b)	___	___	
Where HW is continuously fed into a treatment process, is there a means to stop this inflow (e.g., a waste feed cut-off or bypass system)? 265.401(c)	___	___	
Before the unit is used to chemically treat a HW which is substantially different from waste previously treated, or chemically treat HW with a substantially different process than was previously used, did the facility: 265.402(a)(1-2)			
(i) Conduct waste analysis and trial treatment tests (bench or pilot plant scale)? or:	___	___	
(ii) Obtain written documentation on similar treatment of similar waste under similar operating conditions?	___	___	
Does the facility: 265.403(a)-			
(1) Inspect any discharge control equipment (e.g., waste feed cut-off or bypass systems, drainage systems, pressure relief systems) daily?	___	___	
(2) Gather data from monitoring equipment (e.g., pressure and temperature gauge) at least daily to ensure the unit is operating correctly?	___	___	
(3) Inspect for leaking of seams and fixtures, leaks, or corrosion weekly?	___	___	
(4) Inspect discharge confinement structures (dikes) for leaks (wet spots, dead vegetation) weekly?	___	___	

Chemical, Physical, and Biological Treatment: - Continued
(Part 265 Subpart Q)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in the unit so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.405(a)(1)(i) or:	—	—	NA
Is ignitable or reactive waste treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.405(a)(2)	—	—	
Are incompatible wastes or materials not placed in the same unit unless 265.17(b) is complied with? 254.406(a)	—	—	
Is HW not placed in unwashed treatment equipment that previously held an incompatible waste or material (unless 265.17(b) is complied with)? 265.406(b)	—	—	
At closure, has the facility removed all HW and HW residues from the treatment processes or equipment, discharge control equipment and confinement structures? 265.404	—	—	

260.10 Definitions
(Part 266)

"Boiler" means an enclosed device using controlled flame combustion and having the following characteristics:

(1)(i) The unit must have physical provisions for recovering and exporting thermal energy in the form of steam, heated fluids, or heated gases; and

(ii) The unit's combustion chamber and primary energy recovery sections(s) must be of integral design. To be of integral design, the combustion chamber and the primary energy recovery sections(s) (such as waterwalls and superheaters) must be physically formed into one manufactured or assembled unit. A unit in which the combustion chamber and the and the primary energy recovery sections(s) are joined only by ducts or connections carrying flue gas is not integrally designed; however, secondary energy recovery equipment (such as economizers or air preheaters) need not be physically formed into the same unit as the combustion chamber and the primary energy recovery section. The following units are not precluded from being boilers solely because they are not of integral design: process heaters (units that transfer energy directly to a process stream), and fluidized bed combustion units; and

(iii) While in operation, the unit must maintain a thermal energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel; and

(iv) The unit must export and utilize at least 75 percent of the recovered energy, calculated on an annual basis. In this calculation, no credit shall be given for recovered heat used internally in the same unit. (Examples of internal use are the preheating of fuel or combustion air, and the driving of

induced or forced draft fans or feedwater pumps); or

(2) The unit is one which the Regional Administrator has determined, on a case-by-case basis, to be a boiler, after considering the standards in § 260.32.

"Industrial furnace" means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame devices to accomplish recovery of materials or energy:

- (1) Cement kilns
- (2) Lime kilns
- (3) Aggregate kilns
- (4) Phosphate kilns
- (5) Coke ovens
- (6) Blast furnaces
- (7) Smelting, melting, and refining furnaces (including pyrometallurgical devices such as cupolas, reverberator furnaces, sintering machine, roasters, and foundry furnaces)
- (8) Titanium dioxide chloride process oxidation reactors
- (9) Methane reforming furnaces
- (10) Pulping liquor recovery furnaces
- (11) Combustion devices used in the recovery of sulfur values from spent sulfuric acid.

Recyclable Materials Used in a Manner Constituting Disposal:
(Part 266 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility handle recyclable materials that are placed on or applied to the land? 266.20(a)(1-2) If YES, _____	_____	_____	<u>NA</u>
Is the material either a commercial fertilizer, or a product produced for use by the general public? 266.20(b) and: _____	_____	_____	
The recyclable materials have been chemically bound to the commercial product, and cannot be separated by physical means? and: _____	_____	_____	
The products meet the applicable treatment or prohibition standards in Part 268 Subpart D (see checklist) for each recyclable HW constituent they contain?*	_____	_____	
If NO to any of 266.20(b) above, did the facility comply with all RCRA TSD facility requirements? 266.21,-22,-23 _____	_____	_____	
If the recyclable materials used in a manner constituting land disposal were regulated under Part 268, did the recycler submit a certification (see 268.7(b)(5)), and a notice listing the EPA HW number, corresponding treatment standard, and any analysis, to the RA? 268.7(b)(8) and: _____	_____	_____	
Has the recycler kept records of the name and location of each entity receiving the waste-derived product? 268.7(b)(8) _____	_____	_____	
Has the facility not sprayed waste and/or used oil contaminated with dioxin or any other HW (except those listed solely for ignitability) on roads for dust suppression or road treatment? 266.23(b) _____	_____	_____	

*Except zinc-containing fertilizers using HW K061 that are produced for the general public's use. They are exempt. 266.20(b)

Hazardous Waste Burned for Energy Recovery:
(Part 266 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility handle hazardous wastes (including fuels produced from HW by blending, processing, or other treatment) that are burned for energy recovery in a boiler or industrial furnace?* 266.30(a)	—	—	N
Are these HW fuels exempt from this Subpart because they are: 266.30-			
(a) Gas recovered from HW management activities and burned for energy recovery?	—	—	
(b)(1) Used oil that is a HW solely because it exhibits a Part 261 Subpart C characteristic? (See 266 Subpart E, Used Oil Burned for Energy Recovery.)	—	—	
(b)(2) Wastes that are exempt under Part 261.4 (Exclusions), or 261.6(a)(3)(v-ix)?	—	—	
(b)(2) From conditionally-exempt small quantity generators (261.5)?	—	—	
Does the facility ensure that no fuel which contains HW is burned in any cement kiln which is located within the boundaries of any incorporated municipality with a population >500,000 unless the kiln fully complies with incinerator regulations? 266.31(c)	—	—	
If the facility generates or initiates a shipment of HW fuel, have they complied with Part 262 (generator) requirements? 266.32(a) and 266.34(d)	—	—	
If the facility transports HW fuel or HW used to produce a fuel, have they complied with Part 263 (transporter) requirements? 266.33	—	—	
If the facility stores HW fuel, have they complied with all applicable HW storage facility regulations? 266.34(c), 266.35(c)(1-3)	—	—	

*Except incinerators regulated under 265 Subpart O. Boilers must meet the specifications defined on -266: Definitions-

Hazardous Waste Burned for Energy Recovery: - Continued
(Part 266 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Marketers:			
Does the facility market HW fuel? (e.g., generators who market HW fuel directly to a burner, distributors of HW fuel, facilities that received HW from generators and produce, process, or blend HW fuel) 266.34			NA
Have they notified the EPA of their HW fuel activity (even if they previously notified of other HW management and received an EPA ID#)? 266.34(b)			
Before they initiate the first shipment of HW fuel to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			
The burner or marketer has notified EPA and identified his waste-as-fuel activities? 266.34(a), 266.34(e)(1)(i)			
If the recipient is a burner, the burner will burn HW fuel only in a unit identified in 266.31(b)(p. D3)? 266.34(a), 266.34(e)(1)(ii)			
Before a marketer accepts the first shipment of HW fuel from another marketer, has he provided the other marketer with the notice described above? 266.34(e)(2)			
Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in HW fuel transactions with each person? 266.34(f)			

Hazardous Waste Burned for Energy Recovery: - Continued
(Part 266 Subpart D)

Burners:	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the facility* that burns HW fuel: 266.35-			
(a) Met 266.31(b) below?	—	—	NA
(b) Notified the EPA of their HW fuel activity (even if they previously notified of other HW management and received an EPA ID#)? 266.35(b)	—	—	
Before the burner accepts the first shipment of HW fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.35(d)			
(1) He has notified EPA and identified his waste-as-fuel activities?	—	—	
(2) He will burn the fuel only in a unit identified in 266.31(b) below?	—	—	
Has the burner kept copies of each certification notice sent to a marketer for three years from the date he last received HW fuel from the marketer? 266.35(e)	—	—	

Prohibitions:

Hazardous waste fuel may be burned for energy recovery in only the following devices: 266.31(b)

(1) Industrial furnaces, as defined in 260.10 (see p. -266: Definitions-).

(2) Boilers, as defined in 260.10 (see p. -266: Definitions-), that are identified as follows:

(i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or

(ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale.

*Includes generator that burn their own HW fuel on-site.

Used Oil Burned for Energy Recovery:
(Part 266 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility handle used oil burned for energy recovery in any boiler or industrial furnace (except 265 Subpart O incinerators)?* 266.40(a)	—	—	<u>NO</u>
Does the used oil fuel burned for energy recovery meet the qualifications: 266.40-			
Contains HW from conditionally exempt small quantity (261.5) generators only? -(d)(2) <u>or</u> :	—	—	
Has not been mixed with HW and exhibits only 261 Subpart C HW characteristics? -(c), -(d)(1) and:	—	—	
Contains no more than 1,000 ppm total halogens?** -(c)	—	—	
If NO, the used oil is a HW fuel. Go to 266 Subpart D. 266.40(c)-(d)(2)			

USED OIL EXCEEDING ANY SPECIFICATION LEVEL
IS SUBJECT TO THIS SUBPART WHEN BURNED
FOR ENERGY RECOVERY***

<u>CONSTITUENT/PROPERTY</u>	<u>ALLOWABLE LEVEL</u>
ARSENIC (As).....	5 ppm maximum
CADMIUM (Cd).....	2 " "
CHROMIUM (Cr).....	10 " "
LEAD (Pb).....	100 " "
FLASH POINT.....	100 °F minimum
TOTAL HALOGENS.....	4,000 ppm maximum**

*"Used oil" means any oil that has been refined from crude oil, used, and as a result of such use, is contaminated by physical or chemical impurities. "Used oil fuel" includes any fuel produced from used oil by blending, processing, or other treatment. 266.40(a) See also p. -266: Definitions.

**Used oil containing >1,000 ppm total halogens is presumed to be a HW (due to mixing with other HWs) until successfully rebutted (i.e., demonstrated not to contain Appendix VIII halogenated hazardous constituents).

***The specifications do not apply if mixed with any HW not from a conditionally exempt SQG.

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility market* used oil fuel? 266.43(a)	—	—	NA
Is the facility exempt from marketer reg.s because they: 266.43(a)-			
(1) Are used oil generators, or collectors who transport used oil received only from generators, who do not market directly to a person who burns it for energy recovery? or:	—	—	
(1) Market to burners who are only burning some of the used oil fuel incidentally to processing or other treatment before they then market? or:	—	—	
(2) Only market used oil fuel that another facility has already claimed meets the specifications?	—	—	
If the facility is the first to claim the used oil meets specifications (and is thus exempt) have they: 266.43(b)(1), -(6)-			
(i) Kept copies of the analysis or determination for 3 years?	—	—	
(ii) Recorded in an operating log:			
(A) The name and address of the facility receiving the shipment?	—	—	
(B) The quantity delivered?	—	—	
(C) The date of shipment/delivery?	—	—	
(D) A cross reference to the analysis?	—	—	
Have they notified EPA of their used oil management activity, even if they previously notified of other HW management and received an EPA ID#? 266.43(b)(3)	—	—	

*e.g., generators who market used oil fuel directly to a burner, distributors of used oil fuel, facilities that receive used oil from generators and produce, process, or blend used oil fuel.

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Before they initiate the first shipment of off-spec. used oil to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			
The burner or marketer has notified EPA as above? 266.41(a), 266.43(b)(5)(A)	—	—	NA
If the recipient is a burner, the burner will burn the fuel only in a unit identified in 266.41(b) (p. E4)? 266.43(a), -(b)(5)(B)	—	—	
Before a marketer accepts the first shipment of off-spec. used oil from another marketer, has he provided the other marketer with the notice just described? 266.43(b)(5)(B)(ii)	—	—	
Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in off-spec. used oil transactions with each person? 266.43(b)(6)(ii)	—	—	
Before the facility initiates a shipment of off-spec. used oil, did they send an invoice to the receiving facility containing: 266.43(b)(4)-			
(i) An invoice number?	—	—	
(ii) The sender & receiver's ID #s?	—	—	
(iii) The names & address of both facilities?	—	—	
(iv) The quantity of off-spec. used oil to be delivered?	—	—	
(v) The dates of shipment/delivery?	—	—	
(vi) The following statement: "This used oil is subject to EPA regulation under 40 CFR Part 266"?	—	—	
Has the facility kept copies of invoices received or sent for three years? 266.43(6)(ii)	—	—	

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

Burners:	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the facility that burns off-spec. used oil fuel: 266.44-			
(a) Met 266.41(b) below?	_____	_____	NA
(b) Notified the EPA stating their location and describing their used oil management activity (even if they previously notified of other HW management and received an EPA ID No.)*? 266.43(b)	_____	_____	
Before the burner accepts the first shipment of off-spec. used oil fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.44(c)-			
(1) He has notified EPA as required?	_____	_____	
(2) He will burn the fuel only in a unit identified in 266.41(b) below?	_____	_____	
Has the burner kept copies of the one-time certification notice for three years after he last received oil from the marketer? 266.44(e)	_____	_____	
Has the burner kept copies of each invoice received for 3 years? 266.44(e)	_____	_____	
If the facility burns their own used oil fuel, have they either complied with all burner requirements or obtained analysis documenting that the used oil meets specifications? 266.44(d)(1)	_____	_____	
If the burner treats off-spec. used oil by processing, blending, or other treatment to meet the specifications, have they obtained analysis documenting that the used oil now meets specifications? 266.44(d)(2)	_____	_____	
Has the burner kept the analysis for three years? 266.44(e)	_____	_____	

*Except facilities using oil-fired space heaters under 266.41(b)(2).

Used Oil Burned for Energy Recovery: - Continued
(Part 266 Subpart E)

Prohibitions:

Off-specification used oil may be burned for energy recovery only in the following devices: 266.41(b)-

- (1) Industrial furnaces, as defined in 260.10 (see p. -266: Definitions-).
- (2) Boilers, as defined in 260.10 (see p. -266: Definitions-), that are identified as follows:
 - (i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or
 - (ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale; or
 - (iii) Used oil-fired space heaters provided that:
 - (A) The heater burns only used oil that the owner/operator generates or used oil received from do-it-yourself oil changers who generate used oil as household waste;
 - (B) The heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and
 - (C) The combustion gases from the heater are vented to the ambient air.

Recyclable Materials Utilized for Precious Metals Recovery
(Part 266 Subpart F)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility generate, transport, or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? 266.70(a)	_____	_____	NA
Has the facility complied with the applicable requirements of: 266.70(b)-			
(1) RCRA 3010 Notifications?	_____	_____	
(2) Subpart B of 262 (generators)?	_____	_____	
263.20 & 263.21 (transporters)?	_____	_____	
265.71 & 265.72 (storerers)?	_____	_____	
If the facility stores these materials, have they kept the following records to document they are not accumulating speculatively? 266.70(c)-	_____	_____	
(1) Volume of materials stored at the beginning of the calendar year?	_____	_____	
(2) Amount of materials generated or received during the calendar year?	_____	_____	
(3) Amount of materials remaining at the end of the calendar year?	_____	_____	
Was the amount recycled (or transferred to another facility for recycling) during the year at least 75% of the amount stored at the beginning of the year? 261.1(c)(8)	_____	_____	
Amount at beginning of year	_____	X	.75
Plus			
Amount generated or received	_____		
Minus			
Amount remaining at end of year	_____		
Equals			
Amount recycled during year	_____		greater than or equal to above?

If NO, the facility was accumulating speculatively and all the RCRA HW provisions apply. 266.70(d)

Spent Lead-Acid Batteries Being Reclaimed
(Part 266 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility store spent batteries that are recyclable materials before reclaiming them? 266.80(a)	—	—	NA
If YES, has the facility notified under RCRA 3010? 266.80(b)(1)	—	—	
Have they complied with Part 264 Subparts A-E, F-L except for: waste analysis (264.13) and manifests (264.71-2)? 266.80(b)(2)	—	—	

Land Disposal Restrictions:
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the facility handle any waste restricted from land disposal* since its effective prohibition date: 268.1(b) (See attached listings)			
F001 through F005 spent solvents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
F020 through F026-28 Dioxins?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
"California List" wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
First Third scheduled wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Second Third scheduled wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Exemptions: Are the prohibited wastes exempted from land disposal restrictions because:

The waste is from conditionally-exempt small quantity generators? 268.1(c)(4) ☐ ☒ _____

A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(c)(5) ☐ ☒ _____

An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d) ☐ ☒ _____

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Exceptions: Can the restricted wastes continue to be land disposed because:

A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? 268.1(c)(1)(all), ☐ ☒ _____
268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), _____
268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.1(c)(2)

An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a) ☐ ☒ _____

*Land disposal means placement in or on the land, including a landfill, surface impoundment, waste pile, land treatment facility, salt dome formation, underground mine or cave, injection well, or placement in a concrete vault or bunker for disposal. 268.2(a) Injection wells are being covered under a separate schedule.

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
A generator certifies a good-faith effort in compliance with 268.8 "soft-hammer" regulations? 268.1(c)(5)	—	✓	

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

Has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3	—	✓	
--	---	---	--

Storage:

Are restricted wastes only being stored where: 268.50-

(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	—	✓	
---	---	---	--

(a)(2) A TSD is accumulating a batch as above? and:	—	—	
---	---	---	--

(i) Each container is marked with the contents and accumulation start date?	—	—	
---	---	---	--

(ii) Each tank is marked with the contents, accumulation start date, quantity of HW, and/or the information is in the operating record?	—	—	
---	---	---	--

(c) The TSD can <u>prove</u> that any storage over one year was solely for the purpose of necessary accumulation? or:	—	—	
---	---	---	--

(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation wide variance, or a valid "soft hammer" 268.8 certification?	—	—	
--	---	---	--

(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?	—	—	
--	---	---	--

(f) After 7/8/87, are liquid HW over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?	—	—	
---	---	---	--

See p. 268:8 for off-site storage facility record keeping requirements.

Land Disposal Restrictions:- Continued
(Part 268)

<u>Generators:</u> Waste Analysis	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Did the generator determine if liquid CA list wastes sludges an solids were CA list liquids? 268.32(j)(1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.44 & -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.34(i)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	EP tox.
Notices, Certifications, and Demonstrations:			
If determined that the waste is <u>restricted and requires treatment</u> before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(i) EPA HW ID number?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) Appropriate treatment standards and prohibitions?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) Manifest number for the waste?	<input type="checkbox"/>	<input type="checkbox"/>	
(iv) Available waste analysis data?	<input type="checkbox"/>	<input type="checkbox"/>	

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the waste is determined to be <u>restricted but not required further treatment</u> , has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Did the notification include: 268.7(a)(2)(i)-

(a) EPA HW ID number?	<input type="checkbox"/>	<input type="checkbox"/>	
(b) Appropriate treatment standards and prohibitions?	<input type="checkbox"/>	<input type="checkbox"/>	
(c) Manifest number for the waste?	<input type="checkbox"/>	<input type="checkbox"/>	
(d) Available waste analysis data?	<input type="checkbox"/>	<input type="checkbox"/>	

Was the following certification signed: 268.7(a)(2)(ii)-

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

If the generator's waste is subject to a national variance, an extension or an exemption, have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)

Did the notice include: 268.7(a)(3)-

(i) EPA HW ID number?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(ii) Appropriate treatment standards and prohibitions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iii) Manifest number for the waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(iv) Available waste analysis data?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(v) The date the waste is subject to prohibitions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

NOTE: If the recipient of the generator's waste is not on the attached list (p. 12) of known land ban facilities, or if an off-site shipment without notification has occurred, indicate the accepting TSD facility on p. 12 for proper follow-up.

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If determined that the waste is a <u>First Third or Second Third</u> waste without <u>treatment standards</u> and not a CA list waste (and thus a "soft hammer" waste), have they notified the receiving facility with each shipment? including: 268.7(a)(4)-	___	___	<i>all have treatment standards</i>
(i) EPA HW ID number?	___	___	<i>N/A</i>
(ii) Appropriate certifications and the restrictions under 268.33(f) for "soft hammer" waste?	___	___	
(iii) Manifest number for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)	✓	___	_____
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	✓	___	_____
Generators of First Third and Second Third "soft hammer" wastes (268.33(f)) shipped for land disposal:			
Prior to shipment for land disposal, has the generator certified and submitted to the RA a demonstration of a good faith effort to locate and contract with treatment and recovery facilities for the practically available treatment which provides the greatest environmental benefit? 268.8(a)(1-2)	✓	___	_____
Did the demonstration include a list of facilities and representatives contacted, complete with addresses, phone numbers, and contact dates? 268.8(a)(2)	✓	___	_____

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Was a copy of the demonstration submitted to the receiving facility with the first shipment of waste? 268.8(a)(3) or -(4)	✓	—	_____
Was a copy of the certification submitted with each shipment of waste? 268.8(a)(3) or -(4)	✓	—	_____
Are copies of the demonstration and certification kept on-site for at least five years? 268.8(a)(3) or -(4)	✓	—	_____
If the generator determined there is <u>no practical treatment</u> for his waste, did the demonstration include a written discussion and the following certification? 268.8(a)(2)(i)	✓	—	_____
I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.			
If the generator determines that there <u>are practical treatments</u> for the waste, did they contract to use the technology that they demonstrated yields the greatest environmental benefits? 268.8(a)(2)(ii)	✓	—	_____
Did they include the following certification? 268.8(a)(2)(ii)	✓	—	_____
I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or otherwise provide treatment) by the practically available technology that yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.			
Has the generator immediately notified the RA of any changes in the conditions on which the certification was based? 268.8(b)(1)	✓	—	_____

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
If the RA invalidated a certification, has the generator immediately ceased shipments of wastes, informed all facilities that received the waste, and retain records of the communication on-site in their files? 268.8(b)(3)	—	—	NA
<u>Treatment Facilities: Waste Analysis</u>			
Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)	—	—	NA
Were the non-wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, incinerated in accordance with the requirements of Part 264 Subpart O, or burned in industrial furnaces or boilers in accordance with applicable regulatory standards: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(3)	—	—	
Were the wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, treated by carbon adsorption or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(4)	—	—	
Where the treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)	—	—	

Land Disposal Restrictions:-. Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	—	—	NA
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	—	—	
Notifications and certifications:			
Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)			
(i) EPA HW ID number?	—	—	
(ii) Appropriate treatment standards and prohibitions?	—	—	
(iii) Manifest number for the waste?	—	—	
(iv) Available waste analysis data?	—	—	
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	—	—	
For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read: 268.7(b)(5)(i)	—	—	
I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.			

Land Disposal Restrictions:- Continued
(Part 268)

Yes No Comments

For wastes with treatment standards listed as technologies (268.42) did the certification read:
268.7(b)(5)(ii)

NA

I certify under penalty of law that waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Treatment and Off-Site Storage facilities:

Where waste or treatment residues are sent off-site for further management, did the sender comply with the notification and certification requirements as the generator of the waste?
268.7(b)(6-7)

NA

Where First Third and Second Third "soft hammer" wastes are treated or stored, has a copy of the generator's valid certification and demonstration been retained? 268.8(c)(2) and:

Has the treater or storer forwarded copies of the generator's certification and demonstration (if applicable) to the facility receiving the waste or treatment residues? 268.8(c)(2) and:

Has the treatment or recovery facility certified as follows with each shipment of waste that he has treated the waste in accordance with the generator's demonstration? 268.8(c)(1)

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operations of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Treatment in surface impoundments exemption:			
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			
(1) Treated, not just stored, the wastes in the impoundment?			NA
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?			
(2)(ii) Removed, annually, all treatment residues (including liquids) that do not meet treatment or prohibition standards?*			
(2)(iii) Not placed the residues in another impoundment for subsequent management?*			
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a))? 268.4(a)(3-4)			
Has the facility certified that it is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)			
Is there a principal means of treatment other than evaporation of HW constituents? 268.4(b)			

- * Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Land Disposal Restrictions:- Continued
(Part 268)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?	—	—	NA
(ii) The analysis of test data?	—	—	
(iii) The annual removal of residues which exhibit a HW characteristic?	—	—	
and: (A) Fail 268 Subpart D treatment standards? or:	—	—	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			
(1) 268.32 (CA list) or RCRA 3004(d)?	—	—	
(2) 268.33(f)(1st 3rd & 2nd 3rd)?	—	—	
Land Disposal Facilities:			
Does the facility have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1) (See also 265.73, Operating Record)	—	—	NA
Has the facility tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)	—	—	
Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)	—	—	
Where First Third or Second Third "soft hammer" (268.33(f)) or CA waste liquid (268.32) wastes are disposed, did the facility: 268.7(c)(3), 268.8(d)			
Ensure the required certification (268.8) was received prior to disposal? and:	—	—	
That the disposal unit was in compliance with the "minimum technology" requirements of 40 CFR? 268.5(h)(2)	—	—	

Land Disposal Restrictions:- Continued
(Part 268)

Identified TSFs that treat LDR Waste:

AZD049318009	Buds Oil Service
AZD980816102	Environmental Waste Entpr
AZT050010230	Esco
AZD089308803	Safety Kleen
AZD980802897	Safety Kleen
AZD009015389	Southwest Solvents
AZD049314370	Rinchem Co. Inc.
CAD074644659	Baron Blakeslee
CAT000618652	Baron Blakeslee
CAT080014079	Bay Area Environmental
CAD028409019	Crosby & Overton
CAD000633115	IT Corp., San Jose Transfer
CAD008302903	Oil & Solvent Processing
CAD042245001	Omega Chemical
CAD029363876	Orange County Chemical Co.
CAT080012651	Orange County Chemical Co.
CAD095894556	Pacific Treatment Company
CAD008364432	Rho-Chem
CAD980737548	Roehl Corporation
CAD009452657	Romic Chemical
CAD066113465	Safety Kleen
CAD077187888	Safety Kleen
CAD093459485	Safety Kleen
CAD980894562	Safety Kleen
CAT000613935	Safety Kleen
CAT000613919	Safety Kleen
CAD066177783	Safety Kleen
CAT000613893	Safety Kleen
CAT000613976	Safety Kleen
CAT000613992	Safety Kleen
CAT000613950	Safety Kleen
CAT000613927	Safety Kleen
CAD080916968	Safety Kleen
CAD980892475	Safety Kleen
CAT000613984	Safety Kleen
CAD053044053	Safety Kleen
CAD980817159	Safety Kleen
CAT000613943	Safety Kleen
CAT000613968	Safety Kleen
CAD059494310	Solvent Services
CAT080033681	Chem Tech Inc. (formerly Triple J Pacification)
NVD980895338	Eticam

ID#

Name/Address

Accepted w/o
Certification?

TREATMENT/STORAGE/DISPOSAL FACILITIES
CEI CHECKLIST

SITE ID#: CAD009198367 INSPECTION DATE: 23 Oct. 90
SITE NAME: Campbells Soup
LOCATION: 6200 Franklin Blvd
Sacramento CA 95824
City State Zip Code
LEAD INSPECTOR: Posner OFFICE: Sacto.

INDEX FOR T/S/D'S CHECKLIST

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Also Completed:

Transporter _____

LINE OUT ITEMS NOT APPLICABLE TO THIS FACILITY

Facility Representatives:

Other Inspectors:

Documents Copied or Requested:

Areas Present / Inspected:

Facility Recipient
of Report

Mailing Address
(if different)

Generators
(Part 261)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility qualify as a conditionally exempt small quantity generator each calendar month by:			
Generating less than 100 kgs, and accumulating less than 1000 kgs of HW on site? 261.5(a),(g) or:	_____	_____	_____
Generating and accumulating less than 1 kg of acute HW, or 100 kgs of acute HW contaminated soil or spill residues? 261.5(e)(1-2)	_____	_____	_____
If NO, proceed to the next page.			
Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			
(1) HW removed from on-site storage?	_____	_____	_____
(2) HW produced by on-site treatment or reclamation of HW that was already counted once?	_____	_____	_____
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:	_____	_____	_____
HW exempted from regulation? 261.5(c)	_____	_____	_____
Does the facility generate HW?	_____	_____	_____
Has the generator of solid wastes made a HW determination by determining if the waste is: 262.11			
(a) Excluded from regulation under 261.4?	_____	_____	_____
(b) Listed as a HW in 261 Subpart D?	_____	_____	_____
(c) Exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	_____	_____	_____
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	_____	_____	_____
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	_____	_____	_____

Generators (all except Conditionally Exempt)
(Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling HW? 262.12(a)	✓	—	_____
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	✓	—	_____

Generation Points

The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)

They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:

The area is under the control of the operator of the process generating the waste? and:

(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?

(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?

When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2)-

Continue to comply with the storage requirements above? and:

Mark the container holding the excess with the date the excess amount of HW began accumulating? and:

Comply with all 90-day storage requirements (262.34(a)) within three days?

Generators of Between 100 and 1000 kg/month
(Part 262)

Yes No Comments

100-1000 kgs/mo. Generator Qualifications

Does the facility generate between 100 and 1000 kilograms of non-acute* HW per month, and never accumulate more than 6000 kilograms of HW on site? _____

✓ generate more than 1000 kg/month

If NO, go to fully regulated generators, p. 6.

Has the 100-1000 kg/mo. generator accumulated HW on site for no more than 180 days** without a permit or interim status? 262.34(d) _____

NA

Have they accumulated less than 6000 kgs of HW on site at any time? 262.34(d)(1) _____

If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f) _____

Did the 100-1000 kg/mo. generator that treats, stores, or disposes of HW on-site submit a Part A application by 3/24/87? 270.10(e)(iii) _____

While accumulating waste, has the 100-1000 kg/mo. generator complied with the requirements for storage in containers, 265 Subpart I (except for the 50 foot rule (265.176))? 262.34(d)(2) _____

Have they complied with 265.201, storage in tanks (attached) 262.34(d)(3)? _____

Has the 100-1000 kg/mo. generator complied with the requirements for: 262.34(d)(4) _____

*Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute HW (listed in 261.33(e)) are fully-regulated generators. (21.5(f)(2), revised 7/19/88).

**270 days if they must transport more than 200 miles to TSD facility. 262.34(e)

Generators of Between 100 and 1000 kg/month - Continued
(Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
265 Subpart C, preparedness and prevention? and:	—	—	N/A
Clearly marked the date accumulation started on each container? and:	—	—	
Labelled each container and tank with the words "Hazardous Waste"?	—	—	
Does the generator have an emergency coordinator (EC) on site or immediately available at all times?	—	—	
262.34(d)(5)(i)	—	—	
Is the following information posted next to the telephone: 262.34(d)(5)(ii)-			
(A) EC's name and phone number?	—	—	
(B) Location of fire extinguishers, spill control material, and any fire alarms?	—	—	
(C) If no direct alarms, the phone number of the fire department?	—	—	
Are all employees familiar with their jobs, proper waste handling, and emergency procedures?	—	—	
262.34(d)(5)(iii)	—	—	
If an emergency has occurred, has the emergency coordinator: 262.34(d)(5)(iv)-			
(A) Tried to extinguish the fire, or called the fire department?	—	—	
(B) In the event of a spill, contained the flow of HW, and cleaned up as soon as possible?	—	—	
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800) 424-8802 and reported:	—	—	
(1) The generator's name, address, and EPA ID#?	—	—	
(2) Date, time, and type of incident?	—	—	
(3) Quantity and type of HW involved?	—	—	
(4) Extent of any injuries?	—	—	
(5) Estimated quantity and disposition of any recovered materials?	—	—	

Generators of Between 100 and 1000 kg/month - Continued
(Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Did the generator keep copies of signed manifests, waste analysis, test results, or HW determinations for 3 years after the waste was last sent for on- or off-site treatment, storage, or disposal? 262.44(a)	—	—	N/A
Is the 100-1000 kg/mo. generator's HW reclaimed under a contractual agreement? 262.20(e)- If yes:	—	—	
(1)(i) Does the waste reclamation contract specify the type of waste and frequency of shipments?	—	—	
(ii) Is the transport vehicle owned and operated by the recycler/reclaimer?	—	—	
(2) Did the generator keep a copy of the contractual agreement for 3 years after the agreement ended?	—	—	
If not reclaimed under contract, complete below and Manifests (next page).			
Did the 100-1000 kg/mo. generator who has not received a signed copy of the manifest from the TSD within 60 days submit a copy of the manifest to the RA with a note indicating they have not received confirmation of delivery? 262.42(b), 22.44(b)	—	—	

Generators
(Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Manifests: 262.20-			
(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(c) Has the facility designated an emergency alternate facility? or:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	<input type="checkbox"/>	<input type="checkbox"/>	
Did the generator use the supplied manifest required by a consignment State: 262.21-	<input type="checkbox"/>	<input type="checkbox"/>	
(a) Where the receiving facility is located? or, if not provided by that state:	<input type="checkbox"/>	<input type="checkbox"/>	
(b) Where the generating facility is located?	<input type="checkbox"/>	<input type="checkbox"/>	
(c) If not provided by either state, the EPA form from another source?	<input type="checkbox"/>	<input type="checkbox"/>	
Did the manifest consist of enough copies? 262.22	<input type="checkbox"/>	<input type="checkbox"/>	
Did the generator: 262.23(a)	<input type="checkbox"/>	<input type="checkbox"/>	
(1) Sign the manifest by hand?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Keep one copy of the manifest (per 262.40(a))?	<input type="checkbox"/>	<input type="checkbox"/>	
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	<input type="checkbox"/>	<input type="checkbox"/>	

Generators
(Part 261)

Manifests: Continued-

Yes No Comments

If the shipment was sent by water or
rail, did the generator send at least
3 copies of the manifest to the
designated facilities?
262.23(c), -(d)

— — NA

Pre-Transport Requirements:
(262 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Proper shipping name [table column 2]?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Proper ID number [table column 3A]?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Proper ORM designation for containers of ORM-A, B, C, D, or E wastes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are containers of 110 gallons or less marked with the following words: 262.32(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
Manifest Document Number _____	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

90-Day Storage

If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)

TSD permitted storage facility over 90 days

Are containers visibly marked with the date accumulation started? 262.34(a)(2)

NA

Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)

Interim Status:
(Part 270 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For existing HWM facility to be treated as having been issued a permit, has the facility:			
Obtained an EPA ID # by submitting a Notification of Hazardous Waste Activity?* and/or: 265.11, 270.70(a)(1)	<input checked="" type="checkbox"/>		
Submitted a Part A permit application?** 270.70(a)(1)			
Completed the Part A per 270.13? 270.70(b)			
Never been denied a RCRA permit or interim status? 270.70(c)			
Has the facility complied with the following restrictions while operating under interim status: 270.71(a)-			
(1) Has only treated, stored or disposed of HW specified in the Part A?			
(2) Has only employed processes specified in the Part A?			
(3) Has not exceeded design capacities specified in the Part A?			
Has a revised Part A been submitted prior to the following changes: 270.72-			
(a) T/S/D of HW not previously identified in the Part A?			
(b) Increases in design capacity of processes?			
(c) Changes in or additions to processes?			

*Also see Part 266 Subparts D (HW Fuel Burning) and E (Used Oil Burning) if applicable.

**Earliest applicable of: 11/19/80, 6 months after new reg's published, 30 days after they first become subject to reg's. (270.10(e)(i), -(iii)(3)).

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

10151 CROYDON WAY, SUITE 3
SACRAMENTO, CA 95827-2106

Inspection Report

Campbell Soup Company
6200 Franklin Boulevard
Sacramento, California 95824
EPA I.D. #CAD 009198367

Inspected by: Stephen Posner

Date of Inspection: December 11, 1991

Date of Report: December 24, 1991

I. Purpose

RCRA Non-Major Compliance Evaluation Inspection

II. Representatives Present

Robert Cook, Director Safety/Environmental, Campbell Soup Company

Gloria Luna, Hazardous Materials Specialist, Sacramento County Environmental Management Department

Stephen Posner, Associate Hazardous Materials Specialist, Region 1

III. Owner/Operator

Campbells Soup Company is a New Jersey Corporation with corporate offices located in Camden, New Jersey. The people directly responsible for hazardous waste management at the Sacramento facility are Robert Cook and Aaron Schulte.

IV. Background

The Campbell Soup Company (Campbells) produces convenience foods and juices. Campbells was granted an Interim Status Document (ISD) on March 30, 1981 and on April 6, 1987 Campbells was issued its current hazardous waste facility permit. The current permit expires on April 6, 1992.

The following is a summary of DTSC' inspections at Campbells:

<u>Date</u>	<u>Inspection Type</u>
September 23, 1981	ISD
May 27, 1982	ISD
November 4, 1982	TSCA, PCB
January 14, 1983	TSCA, PCB
August 2, 1983	Permit issued, 1983-1988
May 10, 1985	Permit
May 29, 1986	Permit
January 29, 1987	RCRA Permit
August 23, 1988	RCRA Permit
October 23, 1990	RCRA Permit

V. Facility Description

Campbells produces and packages various food products including canned soups, sauces and fruit juices. The facility operates 24 hours per day. Several water wells supply domestic and industrial process water on the 123 acre site. The plant has a sewer connection to the Sacramento County Sanitation District and has a permit to discharge some of its industrial wastes to the system.

VI. Hazardous Waste Activity Description

Hazardous wastes generated at Campbells consist mainly of solvents and water based paints. The solvents are used in machine operations and cleaning. Commonly used solvents consist of methyl ethyl ketone, methyl isobutyl ketone and xylene. Over the past year Campbells has reduced its use of solvents and is using water based rinses and steam cleaning solutions for product preparation and equipment cleaning.

Waste spent solvents and water based rinses are drummed, labeled and stored in the permitted storage facility on-site. These wastes are transported and recycled by the Romic Chemical Corporation in East Palo Alto California. Rinse water from steam cleaning operations is discharged to the Sacramento County Industrial Sewer System. Other wastes generated by Campbells consist of:

- o Asbestos: Generated infrequently from repair and maintenance of pipe insulation. Waste is transported via registered hazardous waste hauler to landfills which can accept asbestos.

- o Used Batteries: Generated from the replacement of batteries used in various types of machinery; the batteries are recycled by Sacramento Battery located in West Sacramento.
- o Water Based Paint Residues: Generated during the can painting process. These wastes are transported off-site for disposal/recycling by Romic Chemical Corporation.
- o Waste Oil: Generated from the maintenance of equipment and machinery. The oil is drummed and shipped offsite for recycling by the Ramos Oil Company, West Sacramento.
- o Tank Bottom Wastes: Generated from the cleanout of product storage tanks which occurs once every few years.

After collection at various locations in the plant, wastes are stored at the drum storage area. The storage facility is a corrugated metal building with bermed concrete flooring. Warning signs are posted in English and Spanish. The facility is equipped with a telephone, safety shower, portable eyewash, fire extinguisher and personal safety equipment. Other emergency and spill control equipment is stored in or near the storage building.

VII. Violations

None observed.

VIII. Observations

Upon arriving at Campbells, I met Gloria Luna at the facility entrance. We were greeted by Mr. Cook and proceeded to his office. Mr. Cook mentioned that Campbells had recently hired Aaron Schulte to be responsible for "government compliance". Mr. Schulte, however, was not available for the inspection as he was in training.

Mr. Cook went on to say that Campbells is in the process of developing a workplan for closure for the permitted storage facility onsite (Attachment 1). Campbells intends to have all onsite generated waste removed every 90 days.

During the records review, the following documents were reviewed: Facility Permit, Operations Plan, Training Records, Annual Reports, Contingency Plan, Daily Inspection Logs, Closure Plan and Manifests. A review of the annual reports showed that in 1990 Campbells generated the following amounts of waste:

<u>Waste Type</u>	<u>Quantity</u>
Solvents	24,660 gallons
Water Based Enamel Paint	7,590 gallons
Waste Oil	4,750 gallons
Asbestos	105 cubic yards

All records reviewed appeared to be in order. Mr. Cook said he hopes to have all the paper work completed for the closure of the storage facility before April 1992. Campbells current hazardous waste facility permit expires on April 6, 1992.

The walkthrough inspection was conducted with Mr. Cooks assistance. Campbells has a security system which operates 24 hours per day. The entire property is surrounded by a chain link fence and all visitors and plant employees must check in at guard posts near the gates to the plant.

During the walkthrough the following areas were inspected:

- o AB Cooler and Label Room: Here cans are processed, sterilized and filled with products such as soups. Labels are placed on finished can products.
- o Container Manufacturing Department: Containers are manufactured by cutting sheets of tin into predetermined sizes. The tin is coated with a protective film, baked and formed by a "body maker machine". This area has three designated waste accumulation areas. One drum partially full with water based paint was observed. The drum was labeled and had a start of accumulation date of December 10, 1991. In the two other accumulation areas I observed 2 waste oil drums both drums were labeled and dated.
- o Hazardous Waste Storage Area: Access to the storage area is restricted by a locked gate, warning signs were posted on the entrance to the facility. At the time of my inspection, the following wastes were in storage: solvent waste, waste oil, empty drums and one drum

containing PCB solids. All drums appeared to be labeled properly. The storage facility also has a lined wood storage box for used batteries. Batteries are transported offsite on a regular basis for recycling.

Located just outside of the drum storage building is the empty drum storage area. Empty drums are either sent back to the product vender or Capitol Drum in Roseville for recycling.

A bin for the storage of Asbestos is stored near the hazardous waste storage facility. The bin is owned by ARS Inc., Orangevale. Asbestos is stored in the sealed bin before being shipped offsite.

Other areas visited during the walkthrough were the Pallet Storage and Shipping Area, Finished Products Storage Warehouse and the Forklift Repair Shop.

A steam cleaning system has recently been put to use at the Forklift Maintenance Area. Waste from the cleaning system is filtered and reused, filters are replaced when they become clogged. Because the unit is so new, no filters have been replaced to date. Mr. Cook did say that the filters will be disposed of as hazardous waste.

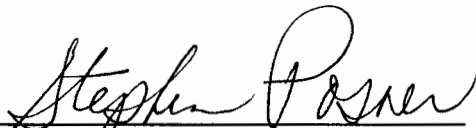
IX. Discussion With Management

An exit interview was conducted with Ms. Luna and Mr. Cook. We discussed generator requirements as Mr. Cook is anticipating Campbells conversion to generator only status. Other items discussed included waste oil filters and the used battery policy. I agreed to send Mr. Cook copies of the policies.

X. Attachments


1. Storage Facility Closure Workplan
2. Photographs
3. CEI Checklist

Inspection Report
Page 6



Stephen Posner
Associate Hazardous Materials Specialist

1-6-92
Date



Nancy K. Lancaster
Senior Hazardous Materials Specialist

1/6/92
Date

Attachments

Campbell SOUP *Company*

* * * *

6200 FRANKLIN BLVD.
SACRAMENTO, CA 95824-3499

* * * *

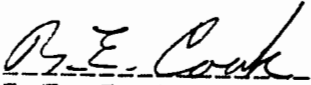
Russell Grace
Dept. of Health Services
Region 1
10151 Croydon Way
Sacramento, Calif. 95827-2106

12-8-91

Mr. Russell Grace

Following our conversation, I have developed a general work plan to move in the direction required for the Campbell Soup Company Sacramento Plant to close the TSD permit we currently have.

I have also contacted Eureka Laboratories and they will be developing a plan to meet all of the issues raised by you in our recent meeting. I expect their portion of the process will be developed by the end of the month and submitted to you for approval. Upon approval, we will implement the plan. If you have any questions - give me a call at 395-5045.



R.E. Cook
Regional Director
Safety/Environmental

cc: D. Lanning
G. Hinton
J. Upton
R. Locke
A. Schulte

CAMPBELL SOUP COMPANY STORAGE FACILITY PERMIT - CLOSURE PLAN

The following procedure will be followed in order that the Campbell Soup Company Sacramento Plant changes status from a permitted storage facility of hazardous waste to a generator of hazardous waste.

FACILITY HISTORY

1. The Sacramento Plant was granted an interim status permit on March 30, 1981 and ultimately permitted as a Small Storage Facility.
2. A container storage area was constructed and this construction certified by Cole/Yee/Schubert & Associates - Structural Engineers on June 10, 1983.
3. Hazardous wastes stored in this area throughout the history of the building fell into these categories:
 - a. waste oil
 - b. solvent wastes
 - c. paint rinse wastes/sludge
 - d. lead acid batteries
 - e. asbestos
 - f. sealed light ballasts containing PCBs
 - g. spill clean-up materials/rags
 - h. misc.. lab wastes - small quantities

CLOSURE PLAN

1. The container storage area will be emptied. The area will be cleaned and all cleaning materials collected and disposed of as hazardous waste. The cleaning materials utilized will be based on the recommendation of Eureka Laboratory as being appropriate for the materials stored in the building.
2. Wipe samples will be taken and analyzed by Eureka Laboratories Inc. in accordance with required procedures for the waste types stored in the building.

3. Eureka Laboratories will be responsible for providing information on :

- a. Decontamination methods
- b. Sampling method
- c. Analytical methods
- d. Quality Assurance Plan
- e. Field Operational Quality Control Plan
- f. Chain of Custody
- g. Analytical results

4. An independent professional engineer will be contracted to certify compliance with the closure plan.

5. All adjacent areas to the container storage area will be inspected for possible contamination with remedial action taken as required.

MAINTENANCE PLAN

1. Upon acceptance of closure by the Department - the Campbell Soup Company Sacramento Plant will retain status as a generator of hazardous waste.

2. All rules and regulations applicable to hazardous waste generators will be monitored and enforced. A schedule has been implemented with the hazardous waste disposal facility to insure compliance with the 90 day storage requirements for hazardous waste generators.

CAMPBELL SOUP COMPANY
6200 Franklin Boulevard
Sacramento, CA 95824
December 11, 1991
EPA I.D. No. CAD 009198367



1. Overlooking
production area
for cans and
labels.



2. Hazardous
waste
accumulation
area, located
at the
Container
Manufacturing
Department.
One drum
contains
solvent waste,
the others are
empty.



3. Closeup photograph of accumulation drum located in the Container Manufacturing Department.



4. Road leading to Drum Storage Area. tanks in photograph are for product storage (diesel, gasoline).



5. Steel bin for the storage of waste asbestos. Note certificates of registration on the side of the bin.



6. South facing wall of the Hazardous Waste Storage Facility. Note warning signs.



7. Inside of the hazardous waste storage facility. Drums are stored no more than two high.



8. Empty drum storage area located outside adjacent to the hazardous waste storage facility. Drums are taken to Capitol Drum, Roseville for recycling.

TREATMENT/STORAGE/DISPOSAL FACILITIES (TSDFs)
RCRA CEI CHECKLIST

SITE ID#: C A D 0 0 9 1 9 8 3 6 7

INSPECTION DATE: 11 December 1991

SITE NAME: Campbell Soup Company

LOCATION: 6200 Franklin Blvd

Sacramento
City

CA 95824
State Zip Code

LEAD INSPECTOR: Posner

OFFICE: Region 1

Line out parts of the index below not applicable to facility inspected.

INDEX FOR TSD CHECKLIST (40 CFR)

<u>Part</u>	<u>Page</u>	<u>Contents</u>
261/262:		GENERATOR REQUIREMENTS
270:	10	Interim Status Qualifications
	11	Loss of Interim Status
265:		GENERAL FACILITY STANDARDS
	12	Waste Analysis Plan
	14	Security and Inspections
	15	Training
	16	Ignitable/Reactive/Incomp.Waste
	17	Preparedness and Prevention
	19	Contingency Plan
	20	. Emergency Coordinator
	21	. Reporting
	22	Manifest System & Recordkeeping
	23	Operating Records
	25	Biennial Report
	26	Ground Water Monitoring
	28	Facilities Affecting GW Quality
	29	Closure & Post Closure
	37	Cost Est. & Fin. Assurance
	40	Liability Requirements
	42	Containers (S01)
43A		Accumulation areas cklist
44		Tanks (S01)
54		100-1000 kg/mo. in tanks

<u>Part</u>	<u>Page</u>	<u>Contents</u>
265		(Continued)
55		Surface Impoundments (S04)(T02) (D83)
59		Waste Piles (S03)
61		Land Treatment (D81)
66		Landfills (D80)
71		Incinerators (T03)
73		Other Thermal Treatment (T04)
74		Open Burning/Open Detonation (T04)
75		Other Chem/Phy/Bio Treatment (T04)
266:		RECYCLING/RECLAMATION
	76	Recyclable Mtls. Used as disposal
	77	HW burned for energy recovery
	80	Used oil burned 4 energy recovery
	85	Precious Metals Reclamation
	86	Lead-acid Battery Reclamation
268:		LAND DISPOSAL RESTRICTIONS
		LDR Attachments

____ Transporter cklist also completed

■ Updated to include final and published revisions of 40 CFR through 9/30/90.

Facility Representatives:

Other Inspectors:

Documents Copied or Requested:

Areas Present / Inspected:

Facility Recipient
of Report

Mailing Address
(if different)

Generators (Part 261)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility qualify as a <u>conditionally exempt small quantity generator</u> each calendar month by:			
Generating less than 100 kgs, and accumulating less than 1000 kgs of HW on site? 261.5(a),(g) or:	—	<input checked="" type="checkbox"/>	—
Generating and accumulating less than 1 kg of acute HW, or 100 kgs of acute HW contaminated soil or spill residues? 261.5(e)(1-2)	—	—	—
<u>If NO, proceed to the next page.</u>			
Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			
(1) HW removed from on-site storage?	—	—	—
(2) HW produced by on-site treatment or reclamation of HW that was already counted once?	—	—	—
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:	—	—	—
HW exempted from regulation? 261.5(c)	—	—	—
Does the facility generate HW?	—	—	—
Has the generator of solid wastes made a HW determination by determining if the waste is: (262.11)			
(a) Excluded from regulation under 261.4?	—	—	—
(b) Listed as a HW in 261 Subpart D?	—	—	—
■(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 261, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	—	—	—
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	—	—	—
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	—	—	—

[NOTE: Disposal of the following PCB wastes & materials are exempt from 40 CFR Parts 261 thru 265 & notifications of Section 3010 of RCRA: (261.8)
(1) PCB-containing dielectric fluid and electric equipment containing such fluid authorized for use and regulated under Part 761 of 40 CFR; and that
(2) Are HW only because of toxicity characteristics (Codes D018 through D043)

GENERATORS
(ALL except Conditionally Exempt)
(Part 262)

	Yes	No	Comments
Has the generator submitted a <u>Notification of Hazardous Waste Activity (EPA Form 8700-12)</u> and obtained an EPA ID number before handling HW? 262.12(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	<input type="checkbox"/>	<input type="checkbox"/>	
<u>HW Generation Points</u> The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:	<input type="checkbox"/>	<input type="checkbox"/>	
The area is under the control of the operator of the process generating the waste? and:	<input type="checkbox"/>	<input type="checkbox"/>	
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?	<input type="checkbox"/>	<input type="checkbox"/>	
When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2) -	<input type="checkbox"/>	<input type="checkbox"/>	
Continue to comply with the storage requirements above? and:	<input type="checkbox"/>	<input type="checkbox"/>	
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Comply with all 90-day storage requirements within three days? (262.34(a))	_____	_____	_____

Generators of Between 100 and 1000 kg/month
(Part 262)

	Yes	No	Comments
100-1000 kgs/mo. Generator Qualifications			
Does the facility generate between 100 and 1000 kilograms of non-acute* HW per month, and never accumulate more than 6000 kilograms of HW on site?	_____	_____	_____
<u>If NO, go to fully regulated generators.</u>			
Has the 100-1000 kg/mo. generator accumulated HW on site for no more than 180 days** without a permit or interim status? 262.34(d)	_____	_____	_____
Have they accumulated less than 6000 kgs of HW on site at any time? 262.34(d)(1)	_____	_____	_____
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f)	_____	_____	_____
Did the 100-1000 kg/mo. generator that treats, stores, or disposes of HW on-site submit a Part A application by 3/24/87? 270.10(e)(iii)	_____	_____	_____
While accumulating waste, has the 100-1000 kg/mo. generator complied with the requirements for storage in containers, 265 Subpart I (except for the 50 foot rule (265.176))? 262.34(d)(2)	_____	_____	_____
Has the 100-1000 kg/mo. generator complied with the requirements for: 262.34(d)(4)			
265 Subpart C, preparedness and prevention? and:			
Clearly marked the date accumulation started on each container? and:	_____	_____	_____
Labelled each container and tank with the words "Hazardous Waste"?	_____	_____	_____

*Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute HW (listed in 261.33(e) are fully-regulated generators. [261.5(f)(2), revised 7/19/88].

**270 days if transported more than 200 miles to TSD facility. 262.34(e).

Continued: Generators of Between 100 and 1000 kg/mo (Part 262)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the generator have an EMERGENCY COORDINATOR (EC) on site or immediately available at all times? 262.34(d)(5)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is the following information posted next to the telephone: 262.34(d)(5)(ii)-	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(A) EC's name and phone number?	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Location of fire extinguishers, spill control material, and any fire alarms?	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If no direct alarms, the phone number of the fire department?	<input type="checkbox"/>	<input type="checkbox"/>	
Are all employees familiar with their jobs, proper waste handling, and emergency procedures? 262.34(d)(5)(iii)	<input type="checkbox"/>	<input type="checkbox"/>	
If an emergency has occurred, has the emergency coordinator: 262.34(d)(5)(iv)-	<input type="checkbox"/>	<input type="checkbox"/>	
(A) Tried to extinguish the fire, or called the fire department?	<input type="checkbox"/>	<input type="checkbox"/>	
(B) In the event of a spill, contained the flow of HW, and cleaned up as soon as possible?	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800) 424-8802 and reported:	<input type="checkbox"/>	<input type="checkbox"/>	
(1) The generator's name, address, and EPA ID#?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Date, time, and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Quantity and type of HW involved?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(5) Estimated quantity and disposition of any recovered materials?	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Did generator keep copies of signed manifests, waste analysis, test results, or HW determinations for 3 yrs. after the waste was last sent for on/off-site treatment, storage, or disposal? 262.44(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Is the 100-1000 kg/mo. generator's HW reclaimed under a contractual agreement? 262.20(e)- If yes:	<input type="checkbox"/>	<input type="checkbox"/>	
(i) Does the waste reclamation contract specify the type of waste and frequency of shipments?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) Is the transport vehicle owned and operated by the recycler/reclaimer?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Did the generator keep a copy of the contractual agreement for 3 years after the agreement ended?	<input type="checkbox"/>	<input type="checkbox"/>	
If not reclaimed under contract, complete below and "Manifests" below.			
Did the 100-1000 kg/mo. generator who has not received a signed copy of the manifest from the TSD within 60 days submit a copy of the manifest to the RA with a note indicating they have not received confirmation of delivery? 262.42(b), 262.44(b)	<input type="checkbox"/>	<input type="checkbox"/>	

MANIFESTS: 262.20-

(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	<input type="checkbox"/>	<input type="checkbox"/>	
(c) Has the facility designated an emergency alternate facility? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	<input checked="" type="checkbox"/>		
(b) Where the generating facility is located?			
(c) If not provided by either state, the EPA form from another source?			
Did the manifest consist of enough copies? 262.22			
Did the generator: 262.23(a)			
(1) Sign the manifest by hand?			
(2) Obtain the signature of initial transporter and date of acceptance on manifest?			
(3) Keep one copy of the manifest (per 262.40(a))?			
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)			
If the SHIPMENT WAS SENT BY WATER or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)			
■ For hazardous waste shipments to a facility in an authorized state which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator? and;			
2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?			

PRE-TRANSPORT REQUIREMENTS: Part 262, Subpart C

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are waste packages labeled in accordance with DOT regulations (49 CFR 172.101)? 262.31	<input type="checkbox"/>	<input type="checkbox"/>	
and; 262.32 (a) including:			
Proper shipping name [table column 2]?	<input type="checkbox"/>	<input type="checkbox"/>	
Proper ID number [table column 3A]?	<input type="checkbox"/>	<input type="checkbox"/>	
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes?	<input type="checkbox"/>	<input type="checkbox"/>	
Are containers of 110 gallons or less marked with the following words: 262.32 (b)	<input type="checkbox"/>	<input type="checkbox"/>	
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address _____	<input type="checkbox"/>	<input type="checkbox"/>	
Manifest Document Number _____	<input type="checkbox"/>	<input type="checkbox"/>	
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	<input type="checkbox"/>	<input type="checkbox"/>	

90-DAY STORAGE 262.34

If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)	<input type="checkbox"/>	<input type="checkbox"/>	<i>permitted facility</i>
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	<input type="checkbox"/>	<input type="checkbox"/>	

Interim Status:
(Part 270 Subpart G)

For existing HWM facility to be treated as having been issued a permit, has the facility:

Yes No Comments

Obtained an EPA ID # by submitting a Notification of Hazardous Waste Activity?* and/or: 265.11, 270.70(a)(1)

✓

Submitted a Part A permit application?** 270.70(a)(1)

Completed the Part A per 270.13? 270.70(b)

■If the facility handles toxicity characteristic waste(s), was an amended Part A submitted by 9/25/90?

Never been denied a RCRA permit or interim status? 270.70(c)

Has the facility complied with the following restrictions while operating under interim status: 270.71(a)-

(1) Has only treated, stored or disposed of HW specified in the Part A?

(2) Has only employed processes specified in the Part A?

(3) Has not exceeded design capacities specified in the Part A?

Has a revised Part A been submitted prior to the following changes: 270.72-

(a) T/S/D of HW not previously identified in the Part A?

(b) Increases in design capacity of processes?

(c) Changes in or additions to processes?

(d) 90 days prior to change in ownership?

(e) Have the changes made not amounted to reconstruction?*

*Also see Part 266 Subparts D (HW Fuel Burning) and E (Used Oil Burning) if applicable.

**Earliest applicable of: 11/19/80, 6 months after new reg's published, 30 days after they first become subject to reg's. (270.10(e)(i), -(iii)(3)).

	Yes	No	Comments
<u>Termination of interim status:</u>			
Did the facility submit a requested Part B in full, and on time? 270.10(e) (5), 270.73(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
For land disposal facilities granted <u>interim status prior to 11/8/84</u> , did the facility submit before 11/8/85: 270.73(c) -			
(1) Part B of permit application?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Certification of compliance with applicable ground water monitoring & financial responsibility requirements?	<input type="checkbox"/>	<input type="checkbox"/>	
For land disposal facilities granted <u>interim status after 11/8/84</u> , did the facility submit within 12 months: 270.73(d) -***			
(1) Part B of the permit application?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Certification of compliance with all GW monitoring and financial responsibility requirements?	<input type="checkbox"/>	<input type="checkbox"/>	
For incinerator facilities, did the facility submit a Part B before 11/8/86? 270.73(e)			
For all other facilities, was a Part B submitted before 11/8/88**? 270.73(f)			

See also applicable interim-status requirements for surface impoundments (265.221(b) and landfills (265.301(b)).

* >50% of the cost of an entirely new facility, except for changes made solely for complying with new regulations for tanks (265.193) and/or Land Disposal Restrictions (268).

** If no, interim status will terminate on 11/8/92.

*** Land disposal facilities newly regulated under the Toxicity Characteristics rule, must comply with groundwater monitoring requirements by 9/25/91.

General Facility Standards:
(Part 265 Subpart B)

Required Notices:

	Yes	No	Comments
Has the RA been notified at least 4 weeks prior to the receipt of HW from a foreign source? 265.12(a) (see also Generators, 262 Subpart F.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)	<input type="checkbox"/>	<input type="checkbox"/>	
If a permit has been transferred to a new owner/operator, was the permit modified or revoked and reissued to identify the new permittee? 270.40	<input type="checkbox"/>	<input type="checkbox"/>	

General Waste Analysis:

■ Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
■ Did the facility perform the analysis before treating, storing or disposing of any HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the facility have records documenting the required HW analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a)(3)	<input type="checkbox"/>	<input type="checkbox"/>	
■ After 9/25/90, was the TCLP test used when applicable?	<input type="checkbox"/>	<input type="checkbox"/>	
Is the analysis repeated when there is a change in the generating process? 265.13(a)(3)(i)	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart B-General Facility Standards

For off-site facilities, is the analysis repeated when the HW received does not match the HW designated on the manifest?

265.13(a)(3)(ii)

Yes No

Comments

NA

For off-site facilities, does the facility inspect or analyze each movement of HW to verify that the HW received matches the identity of the HW specified on the manifest?

265.13(a)(4)

Has the facility developed and followed a written waste analysis plan, and is the plan kept at the facility? 265.13(b)

Does the waste analysis plan contain the following elements: 265.13(b)-

(1) Parameters of analysis of each HW handled and the rationale for the selection of these parameters?

■ (2) The methods which will be used to test for these parameters, including method 1311 (found in SW-846 or 40 CFR Part 261, Appendix II) if the facility handles Toxicity Characteristic waste(s)? 261.24

(3) Sampling method used to obtain a representative sample of each HW?

(4) Frequency with which the initial analysis will be reviewed or repeated?

(5) For off-site facilities, the analysis that generators have agreed to supply?

(6) The methods which will be used to meet the additional analysis requirements for:

Tanks?(265.198-200)

Surface Impoundments?(265.225, & p.K2)

Waste Piles?(265.252)

Land Treatment?(265.273)

Liquids in landfills?(265.314)

Incinerators?(265.341)

Thermal Treatment?(265.375)

Other Treatment?(265.402)

Land Disposal Restrictions?(268.7)

Complete applicable checklist on each unit. See Index for Page No.

General- Waste Analysis Plan

For off-site facilities, does the plan contain: [265.13(c)]

Yes No

Comments

(1) Description of procedures used to identify each movement of HW? _____

NA

(2) Description of the sampling method used to obtain a representative sample of the HW? _____

Unless exempt under 265.14(a) (physical contact or disturbance of the waste and unit will not cause harm), do SECURITY MEASURES include:

A 24-hour surveillance system?
265.14(b)(1) or: _____

Artificial or natural barriers that completely enclose the facility?
265.14(b)(2)(i) and: _____

Means to control entry onto the active portions of the facility at all times?
265.14(b)(2)(ii) _____

Are signs with the legend "Danger- Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)- _____

At each entrance and any other approach to active portions of the facility? _____

Legible from at least 25 feet away? _____

Written in English and any other language predominant in the surrounding area? _____

General Inspection Requirements:

Does the facility inspect for malfunctions, deterioration, operator errors, and HW discharges often enough to correct problems before they cause harm? 265.15(b)(1) _____

Does the facility follow a written inspection schedule? 265.15(a) _____

Is the schedule kept at this facility? 265.15(b)(2) _____

Cont'd., Fac. Inspec. Requirements

Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b)(3)-

Yes No

Comments

Monitoring equipment?

Safety, emergency equipment?

Security devices?

Operating and structural equipment?

Does the schedule include: 265.15(b)(4)-

The frequency of inspection for each item?

Daily inspections for loading and unloading areas?

The inspection frequencies required for each unit?

Has the facility taken immediate remedial action to correct hazards revealed on an inspection? 265.15(c)

Are inspections recorded in an inspection log?
Does the log include: 265.15(d)

Date and time of inspection?

Name of inspector?

Observations noted?

Date and nature of repairs or other remedial actions?

Are inspection records kept for at least 3 years? 265.15(d), 265.73(b)(5)

PERSONNEL TRAINING - 265.16

Does the facility have a HW personnel training program? 265.16(a)(1)

Is it directed by a person trained in HW management procedures? 265.16(a)(2)

Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:

(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?

(ii) Key parameters for automatic waste feed cut-off systems?

Cont'd., Pers. Train.

	Yes	No	Comments
(iii) Communication or alarm systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(iv) Response to fire or explosions?	<input type="checkbox"/>	<input type="checkbox"/>	
(v) Response to ground water contamination incidents?	<input type="checkbox"/>	<input type="checkbox"/>	
(vi) Emergency shutdown of operations?	<input type="checkbox"/>	<input type="checkbox"/>	
Are new personnel supervised until training is completed? 265.16(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Do new personnel complete the training within 6 months? 265.16(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Do personnel take part in an annual review of the initial training? 265.16(c)	<input type="checkbox"/>	<input type="checkbox"/>	
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Job Description?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Description of required HW training?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Documentation that HW training or job experience required has been completed?	<input type="checkbox"/>	<input type="checkbox"/>	
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	<input type="checkbox"/>	<input type="checkbox"/>	

REQUIREMENTS for IGNITABLE, REACTIVE, or INCOMPATIBLE WASTES: (265.17)

Are precautions taken to prevent accidental ignition or reaction, including: 265.17(a)-

Separation and protection from ignition sources?

No smoking signs in hazard areas?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Is the T/S/D of ignitable, reactive or incompatible waste conducted so that it does not: 265.17(b) -			

(1) Generate extreme heat or pressure, fire or explosion, or violent reaction?

(2-3) Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?

(4) Damage structural integrity of HW containment devices?

(5) Otherwise threaten human health or the environment?

PREPAREDNESS AND PREVENTION
(Part 265 Subpart C)

Location Standards:

The facility did not place HW in a salt dome, salt bed formation, underground mine or cave? (265.18)

Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31

Does the facility have the following equipment where applicable: 265.32-

(a) Internal communications or alarm system capable of providing immediate emergency instruction?

(b) Telephone or 2-way radios at the scene of operation?

(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?

(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?

Cont'd., Prevention

	Yes	No	Comments
Does the facility test and maintain all <u>emergency equipment</u> in operable condition? 265.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Do personnel in areas where HW is being handled have immediate access to internal alarm or communication systems, or voice or visual contact with another employee? 265.34(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Can personnel that operate the facility while alone immediately access external emergency assistance? 265.34(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35	<input type="checkbox"/>	<input type="checkbox"/>	

Arrangements With Local Authorities:

Has the facility attempted to make the following arrangements/agreements:

Familiarize police, fire dept., and emergency response teams with HW operations? 265.37(a)(1)

Designate primary emergency authority? 265.37(a)(2)

With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)

Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)

Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

	Yes	No	Comments
Does the facility have a <u>contingency plan</u> designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents? 265.51(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the plan describe actions staff must take to comply with 265.51 and 265.56 responses? 265.52(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as <u>emergency coordinators</u> ? 265.52(d)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility? 265.52(d)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan list all <u>emergency equipment</u> including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the plan include an <u>evacuation plan</u> for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	<input type="checkbox"/>	<input type="checkbox"/>	
Is the plan maintained at the facility? 265.53(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the plan been reviewed and immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?	<input type="checkbox"/>	<input type="checkbox"/>	
(b) The plan fails in an emergency?	<input type="checkbox"/>	<input type="checkbox"/>	
(c) Facility changes required it?	<input type="checkbox"/>	<input type="checkbox"/>	

Contingency Plan Cont'd: 265.54

Yes No Comments

(d) The list of emergency coordinators changes?

✓

(e) The list of emergency equipment changes?

Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55

Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55

Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55

If an emergency situation has occurred at this facility, did the emergency coordinator (EC) immediately:

Activate alarm systems? 265.56(a)(1)

Notify the appropriate response agencies? 265.56(a)(2)

Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)

Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)

If assessment indicates the release could threaten harm outside the facility, does the EC:

Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)

Con't., Contingency Plan-Reporting

	Yes	No	Comments
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800/424-8802? 265.56(d)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Did the report include: 265.56(d)(2)-			
(i) The name and phone # of the reporter?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) Name and address of the facility?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) Time and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(iv) Name and quantity of materials involved to the extent known?	<input type="checkbox"/>	<input type="checkbox"/>	
(v) The extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(vi) The possible hazards to the outside area?	<input type="checkbox"/>	<input type="checkbox"/>	
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)	<input type="checkbox"/>	<input type="checkbox"/>	
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)	<input type="checkbox"/>	<input type="checkbox"/>	
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the EC ensure that in the affected areas of the facility: 265.56(h)-			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) All emergency equipment is clean and fit for use before operations resume?	<input type="checkbox"/>	<input type="checkbox"/>	
Does the facility notify the RA, state and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
If the <u>contingency plan</u> has been implemented:			
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Name, address, and phone # of the facility?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Date, time, and type of incident?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Name and quantity of materials involved?	<input type="checkbox"/>	<input type="checkbox"/>	
(5) The extent of any injuries?	<input type="checkbox"/>	<input type="checkbox"/>	
(6) A hazard assessment?	<input type="checkbox"/>	<input type="checkbox"/>	
(7) An estimate of the quantity and disposition of recovered material?	<input type="checkbox"/>	<input type="checkbox"/>	

MANIFEST SYSTEM, RECORD KEEPING, and REPORTING:
(Part 265 Subpart E)

	Yes	No	Comments
<u>Manifest System:</u>			
If the facility receives HW from an off-site source, do they comply with the following manifest requirements:			
(1) Sign and date each copy of the manifest? 265.71(a) (1)	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(2) Note any significant* discrepancies in the manifest? 265.71(a) (2)	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Give transporter one copy of the signed manifest? 265.71(a) (3)	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
(4) Within 30 days after delivery, send a copy of the <u>manifest</u> to the generator? 265.71(a)(4)			N/A
Are records of past shipments retained for 3 years? 265.71(a)(5)			
<u>Manifest Discrepancies:</u>			
Upon discovering a significant discrepancy,* has the facility made an attempt to reconcile with the generator or transporter? 265.72(b)			
For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures? 265.72(b)			
<p>* Significant discrepancies are:</p> <ol style="list-style-type: none"> 1. For bulk waste; variations > 10% in weight. 2. For containerized waste; variations > one drum. 3. Obvious differences such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest. 			

	Yes	No	Comments
<u>Unmanifested Waste Report:</u>			
For a facility that has accepted HW from an off-site source without an accompanying manifest, and the generator was not a conditionally exempt small quantity generator (261.5), was a report containing the required information submitted to the RA within 15 days after receiving the HW? 265.76(a-g)			N/A

	Yes	No	Comments
<u>Operating Record:</u>			
Does the facility maintain an operating record? 265.73(a)	✓		
Does the operating record contain the following information:			
A description and the quantity of each waste received as required by Appendix I? 265.73(b)(1)			
The method(s) and date(s) of its treatments, storage or disposal as required by Appendix I? 265.73(b)(1)			

Cont'd., Operating Record

Yes

No

Comments

The location of each waste within the facility and the quantity at each location? 265.73(b)(2)

✓

For disposal facilities, the location and quantity of each waste recorded on a map or diagram of each cell or disposal area? 265.73(b)(2)

NA

For all facilities, is the location and quantity information cross-referenced to specific manifest numbers? 265.73(b)(2)

✓

Records the results of all waste analyses and trial tests? 265.73(b)(3)

Reports detailing all incidents that required implementation of the contingency plan? 265.73(b)(4)

Records the results of inspections for the last three years? 265.73(b)(5)

Monitoring, testing, and analytical data? 265.73(b)(6)

All closure and post-closure costs as applicable? 265.73(b)(7)

Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units when granted a Part 268 case-by-case extension, monitoring data required by a successful petition, certifications under 268.8 (1st and 2nd third soft hammer), and all applicable generator notices? 265.73(b)(8)

NA

Is a copy of each notice, and any applicable certification and demonstration, required of the generator under Part 268 retained for each shipment of wastes received from off-site for: 265.73(b)-

(9) Treatment?

(11) Disposal?

(13) Storage?

	Yes	No	Comments
Is all information required of a generator under Part 268 including notices (except for the manifest number), and any applicable certification and demonstration, on file where the facility is further handling restricted wastes generated on-site by: 265.73(b)-			
(10) Treating?	<input checked="" type="checkbox"/>		NA
(12) Disposing?			1
(14) Storing?	<input checked="" type="checkbox"/>		

AVAILABILITY, RETENTION, DISPOSITION OF RECORDS:

Are all records, including plans, available for inspection? 265.74(a)	<input checked="" type="checkbox"/>		
Has the facility submitted a <u>biennial report</u> to the RA by March 1 of each even numbered year? 265.75			
Was the report submitted on EPA form 3700-13B? 265.75			
Did the report cover facility activities during the previous calendar year? 265.75			
Does the report include the following information: 265.75-			
(a) EPA identification number, name and address of the facility?			
(b) Calendar year covered by report?			
(c) For off-site facilities, the EPA ID number of each HW generator?			
(d) A description of and quantity of each type of HW received and, for off-site facilities, the EPA ID number of each generator listed with this information?			
(e) Methods of treatment, storage, or disposal for each type of HW?			

Cont'd., Recordkeeping, 265:E	Yes	No	Comments
(f) Ground water monitoring data under 265.94(a)(2)(ii-iii) and (b)(2)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(g) Most recent closure and post-closure cost estimates?	<input type="checkbox"/>	<input type="checkbox"/>	
(h) Signed certification?	<input type="checkbox"/>	<input type="checkbox"/>	

GROUND WATER MONITORING:
(Part 265 Subpart F)

	Yes	No	Comments
If the facility operates a HW surface impoundment, landfill, or land treatment unit*, has a ground water monitoring program consisting of at least one upgradient and 3 downgradient wells been implemented (and certified under 270.73)? 265.90(a)	<input type="checkbox"/>	<input type="checkbox"/>	No RCRA ground water monitoring at this time
If NO, is a written waiver demonstration, certified by a qualified geologist or geotechnical engineer, kept at the site? 256.90(c)	<input type="checkbox"/>	<input type="checkbox"/>	
Date of last CME or O&M: ____/____/____			EPA? ____ State? ____
Is a ground water sampling and analysis plan kept at the facility? 265.92(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Does it include procedures and techniques for: 265.92(a) -			
(1) Sample collection?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Sample preservation and shipment?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Analytical procedures?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Chain of custody control?	<input type="checkbox"/>	<input type="checkbox"/>	
Has an outline of a ground water quality assessment program been prepared? 265.93(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Have records been kept of: 265.94(a)(1)			
Analysis for all parameters (see next page) quarterly for the first year as required by 265.92(c)	<input type="checkbox"/>	<input type="checkbox"/>	
Ground water quality analysis annually since the first year as required by 265.92(d)(1)?	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
<u>Ground water contamination</u> indicators at least semi-annually since the first year as required by 265.92(d)(2)?	_____	_____	_____
Ground water surface elevations taken during each sampling of each well as required by 265.92(e)	_____	_____	_____
*Including units that are inactive but not certified as clean closed.			
Did the owner or operator record ground water analytical data as measured and in a form necessary for the determination of statistical significance for the compliance period of the facility?	_____	_____	_____
265.99	_____	_____	_____
The Student's T-test calculations (at the 0.01 level of significance) for comparison of ground water contamination indicators over initial background as required in 265.93(b)?	_____	_____	_____
If the facility found comparisons for downgradient wells made under 265.93(b) showed a significant increase (or pH decrease) over background levels, proceed to "Facility Affecting GW Quality."			
Have the following been submitted to the RA ? : See 265.77(b), 265.94(a)(2)			
During the first year, the initial background concentrations of parameters listed in 265.92(b) within 15 days after completing each quarterly analysis? 265.94(a)(2)(i)	_____	_____	_____
For each well, were any parameters whose concentrations or values exceeded the maximum contaminant levels allowed in drinking water supplies (Appendix III) separately identified? 265.94(a)(2)(i)	_____	_____	_____
<u>Annual reports by each March 1 including:</u>			
Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b)? 265.94(2)(ii)	_____	_____	_____
See EPA interim primary drinking water standards (265.92(b)(1)): Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate (as N), Selenium, Silver, Endrin, Lindane, Methoxychlor, Toxaphene, 2-4 D, 2,4,5-TP Silver, Radium, Gross Alpha, Gross Beta, Turbidity (surface water), Coliform Bacteria.			

See parameters establishing ground water quality (265.92(b)(2)):
 Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.
 Parameters used as indicators of ground water contamination 265.92(b)(3):
 pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.

SW-Cont'd.	Yes	No	Comments
Separate identification of any significant differences from initial background found in the upgradient wells? 265.94(2)(ii)	_____	_____	_____
Results of the previous year's evaluation of ground water elevations, and a description of any applicable response? 265.94(2)(iii)	_____	_____	_____
<u>Reporting by facilities that may be affecting ground water quality: 265.77(b), 265.93(d)</u>			
If the facility confirmed the determination that they may be affecting ground water quality was not made in error (265.93(c)(2)), was a written notice sent to the RA within 7 days of confirmation? 265.93(d)(1)	_____	_____	_____
Within 15 days of notification to the RA was a certified ground water quality assessment plan submitted? 265.93(d)(2)	_____	_____	_____
After implementation of this plan, did the facility determine if HW or HW constituents from the facility have entered the ground water? 265.93(d)(4)	_____	_____	_____
Within 15 days after the determination was a written report containing the assessment of ground water quality submitted to the RA? 265.93(d)(5)	_____	_____	_____
If HW or HW constituents have been determined to have entered the ground water, are determinations of HW or HW constituents continued on a quarterly basis until final closure of the facility*? 265.93(d)(7)	_____	_____	_____

*If the program was implemented during the post-closure care period, determinations made in accordance with the ground water quality assessment plan may cease after the first determination per 265.93(d)(7)(ii).

Cont'd., GW Monitoring

	Yes	No	Comments
If HW or HW constituents have been determined to have entered the ground water, did the owner or operator institute a corrective action program under 265.10? 264.91	<input type="checkbox"/>	<input type="checkbox"/>	
If no HW or HW constituents were shown to have entered to ground water, was the RA informed of the determination if the indicator evaluation program only was reinstated? 265.93(d)(6) [Defined in 265.92 and 265.93(b).]	<input type="checkbox"/>	<input type="checkbox"/>	
Were records kept of the analysis and evaluations specified in the ground water quality assessment throughout the life of the facility? 265.94(b)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
If a disposal facility, were (are) records kept throughout the post-closure period as well? 265.94(b)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
Are annual reports submitted by March 1 to the RA containing the results of the ground water quality assessment program? 265.94(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Do the reports include the calculated or measured rate of migration of HW or HW constituents during the reporting period? 265.94(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	

CLOSURE and POST-CLOSURE
(Part 265 Subpart G)

	Yes	No	Comments
Does the facility have a closure plan 265.112(a) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Date: _____
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.112(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does the plan identify for the active life of the facility: The steps necessary to completely or partially close the facility at any point? 265.112(b)	<input type="checkbox"/>	<input type="checkbox"/>	
How each Hazardous Waste management unit will be closed? 265.112(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	

Closure & Post-Closure, Cont'd.

	Yes	No	Comments
How final closure standards (265.111) will be met? 265.112(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
The maximum extent of the operation which will be unclosed? 265.112(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
An estimate of the maximum inventory of HW ever on-site? 265.112(b)(3)	<input type="checkbox"/>	<input type="checkbox"/>	
A detailed description of the methods to be used during partial and final closure? including: 265.112(b)(3)	<input type="checkbox"/>	<input type="checkbox"/>	
Removing, transporting, treating, storing, and disposal of all HW?	<input type="checkbox"/>	<input type="checkbox"/>	
Identification of and types of off-site HW management units to be used?	<input type="checkbox"/>	<input type="checkbox"/>	
A detailed description of steps for removal or decontamination during partial and final closure? including: 265.112(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	
Contaminated containment system components, equipment, containers, structures, soils and HW residues?	<input type="checkbox"/>	<input type="checkbox"/>	
Procedures for cleaning equipment and removing contaminated soils?	<input type="checkbox"/>	<input type="checkbox"/>	
Methods for sampling and testing surrounding soils?	<input type="checkbox"/>	<input type="checkbox"/>	
Testing criteria for determining adequacy of clean-up?	<input type="checkbox"/>	<input type="checkbox"/>	
A detailed description of all other activities necessary during partial and final closure to satisfy the closure performance standards? including: 265.112(b)(5)	<input type="checkbox"/>	<input type="checkbox"/>	
Ground water monitoring?	<input type="checkbox"/>	<input type="checkbox"/>	
Leachate collection?	<input type="checkbox"/>	<input type="checkbox"/>	
Run-on and run off control?	<input type="checkbox"/>	<input type="checkbox"/>	
A schedule for closure of each HW unit and for final closure of the facility? Does the schedule include: 265.112(b)(6)	<input type="checkbox"/>	<input type="checkbox"/>	

Total time required to close each unit?

Time required for each intervening closure activity?

An estimate of the expected year of final closure, if the closure plan has not been approved*? 265.112(b)(7)

Has the facility amended the plan whenever affected by changes in: 265.112(c)(1) -

(i) Operating plans or facility design?

(ii) Expected year of closure?

(iii) Problems encountered during partial or final closure?

Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days (30 days if already in a closure period) of unexpected changes? 265.112(c)(2)

If the plan has already been approved, was the amended plan resubmitted to the RA by this deadline? 265.112(c)(3)

*Also applies to facilities that use trust funds to demonstrate financial assurance and expect to close within the next twenty years.

Is the date when the facility expects to begin closure either no later than 30 days after the date on which any HW management unit receives the known final volume of HW? or: 265.112(d)(2)

Is there a reasonable possibility that the HW management unit will receive additional HW no later than one year after receiving the most recent volume? 265.112(d)(2)(i) or:

■ For units meeting the requirements of 265.113(d), is there a reasonable possibility that the HW management unit will receive additional non-hazardous wastes no later than one year after receiving the most recent volume? 265.112(d)(2)(ii)

Does the schedule for closure allow for the following?:

Yes No Comments

Treatment, removal, or disposal of HW within 90 days after receipt of final volume of HW (or non-hazardous wastes if the facility complies with 265.113(d) and (e)), or after approval of the closure plan? 265.113(a)*



Completion of closure plan activities within 180 days after receipt of final volume of HW (or non-hazardous wastes if the facility complies with 265.113(d) and (e)), or after approval of the closure plan? 265.113(b)



Post-closure plan:

No Disposal Units

If the facility operates a hazardous waste disposal unit, do they have a post-closure plan? 265.118(a)

NA

*NOTE: RA may approve a longer compliance period if demonstration approved pursuant to 265.113(a)(1).

If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.118(b)

If the facility was intending to clean-close a surface impoundment or waste pile and found they are required to close it as a landfill, did they submit a post-closure plan to the RA within 90 days? 265.118(a), (d) (3-4)

Does the plan provide for 30 years of post-closure care (unless granted an exemption under 265.118(g))? 265.117(a)(1)

Does the plan describe the monitoring activities and the frequency they will be performed to comply with each unit's regulatory requirements? 265.118(c)(1)

Does the plan describe the maintenance activities and the frequency they will be performed to ensure: 265.118(c)(2)-

(i) The integrity of the cap, final cover or other containment devices?

(ii) The continued function of the monitoring devices?

Cont'd., Post Closure

Yes

No

Comments

Does the plan identify the name, address and phone number of the post-closure period contact? 265.118(c)(3)

NA

Did the facility amend the plan when ever changes in operating plans, facility design, or events which occur during the active life of the facility affect their post-closure plan?

265.118(d)(1)

Did the owner or operator submit a written notification of or request for a permit modification to authorize a change in the approved post-closure plan? 265.118(d)

Was the amendment made at least 60 days prior to any proposed facility changes, and within 60 days of any unexpected changes?

265.118(d)(2)

Was the amended plan resubmitted to the RA by this deadline? 265.118(d)(3)

Closure Activities:

Deadlines for submission of post-, partial-, and final closure plans:

If the plans had not been approved, had the facility submitted the plan at least 180 days prior to the expected closure of the first surface impoundment, waste pile, landfill, or land treatment unit? 265.112(d), -.118(e) or:

■ For HW units meeting the requirements of 265.113(d), is there was a reasonable possibility that the unit will receive additional non-hazardous waste one year since the last non-HW waste was received (unless granted an extension?) 265.112(d)(2)(ii).

Had a closure plan been submitted 45 days prior to the expected closure of a facility with only tanks, container storage, or incinerator units?

265.112(d)

	Yes	No	Comments
If the <u>closure plan</u> had already been approved, was it resubmitted 60 days prior to the expected closure of any surface impoundment, waste pile, land-fill, or land treatment unit? 265.112(d)	_____	_____	NA
Was the "expected closure" date within: 30 days after a HW unit received its known final volume of HW? 265.112(d)(2), -.118(e) or:	_____	_____	
If there was a reasonable possibility the HW unit would receive additional waste, one year since it actually last received a volume of HW (unless granted an exemption)? 265.112(d)(2), -.118(e)	_____	_____	
Was the closure plan submitted within 15 days after termination of interim status for any reason other than being granted a final permit? 265.112(d)(3), -.118(e)(1)	_____	_____	
Facilities in the process of closure:			
■ Was all HW in the closing unit or facility treated, removed, or disposed of on-site, in accordance with the approved closure plan, within 90 days after receiving either the final volume of HW (or non-hazardous waste if the facility complies with 265.113(d) or (e)) or approval of the closure plan? 265.113(a) or:	_____	_____	NA
Did the RA approve a longer period? 265.113(a)	_____	_____	
Facilities that have completed closure activities:			
■ Did the facility complete partial and final closure activities within 180 days after either receiving the final volume of HW (or non-hazardous waste if the facility complies with 265.113(d) or (e)) or approval of the closure plan? 265.113(b) or:	_____	_____	
Was the facility granted an extension? 265.113(b)	_____	_____	

CLOSURE ACTIVITIES, Cont'd.

Yes No

Comments

Have all equipment and structures been properly disposed of or decontaminated by removing all HW and contaminated residues? 265.114

NA

Have all contaminated soils been properly disposed of or decontaminated unless otherwise specified? 265.114

Certification of closure:

Within 60 days of completion of closure of each surface impoundment, waste pile, land treatment, landfill unit, or final facility closure, has a certification by the owner/operator and an independent registered professional engineer been submitted to the RA? 265.77(c), 265.115

NA

No later than the submission of the closure certification for each disposal unit, was a survey plat submitted to the RA and local land authority? 265.116

Was the survey plat prepared and certified by a professional land surveyor?

Did it indicate the locations and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks?

Did it contain a note, prominently displayed, which states the owner's or operator's obligation to restrict disturbance of the HW disposal unit?

Post-closure notices:

Has the owner/operator submitted to the RA and the local land authority within 60 days of the certification of closure of each HW unit a record of the type, location, and quantity of HW disposed of within each disposal unit since January 12, 1981? 265.74(c), 265.119(a)

NA

	Yes	No	Comments
Within 60 days of <u>certification of closure</u> for the first HW disposal unit, and within 60 days of certification of the last HW disposal unit, has the owner/operator: 265.119(b)	___	___	NA
(1) Placed a record in the deed that will in perpetuity notify any potential purchaser of the property that:			
(i) The land was used to manage HW?	___	___	
(ii) Its use is restricted under Subpart G?	___	___	
(iii) The required survey plat (265.116) and disposal records (265.119(a)) have been filed?	___	___	
(2) Submitted to the RA a signed, certified copy of the notice and deed?	___	___	
<u>Post-closure care:</u>			
Has the specified post-closure contact kept the plan during the post-closure care period? 265.118(b)	___	___	
Are all post-closure care activities in the approved plan being performed? 265.117(d)	___	___	
Has the owner/operator, or any subsequent owner of the land, obtained an approved post-closure plan modification before tampering with the HW unit? 265.119(c)	___	___	
At the completion of post-closure care for each unit, did the facility certify to the RA within 60 days that the care was performed in accordance with the post-closure plan's specifications? 265.120	___	___	
Was the certification signed by an independent registered professional engineer? 265.120	___	___	

Financial Requirements:
(Part 265 Subpart H)

	Yes	No	Comments
Is the facility owned by the state or federal government? 265.140(c) If YES, Subpart H is not applicable.		<input checked="" type="checkbox"/>	
<u>Cost estimate for closure:</u>			
Has a written estimate been prepared of the cost of closing the facility? 265.142(a)	<input checked="" type="checkbox"/>		
What is the amount of the closure cost estimate?			\$ _____
Does the cost estimate cover all the activities in the closure plan? 265.142(a) -	<input checked="" type="checkbox"/>		
(1) Does the estimate equal the cost of closure at the point when the extent and manner of the operation would make closure the most expensive?			
(2) Is the estimate based on the costs of hiring a third party (not a subsidiary or parent corporation) to close the facility?			
■ (3) Has the estimate not incorporated any salvage values (including non-hazardous wastes if applicable under 265.113(d))?			
■ (4) Where the HW (or non-hazardous wastes if applicable under 265.113(d)) might have some economic value, was its cost greater than zero?			
Has the cost estimate been adjusted annually and within the required time frames? 265.142(b)			
If the closure cost adjustment was not made by recalculating the cost in current dollars, was the adjustment made by using an inflation factor*? 265.142(b)			

Cont'd: Estimates for Closure

	Yes	No	Comments
Was the cost estimate revised no later than 30 days after a change in the closure plan increased the cost of closure? 265.142(c) (Revised estimate must be adjust for inflation.)	<input type="checkbox"/>	<input type="checkbox"/>	_____
Are the latest closure cost estimate and adjusted closure cost estimates kept at the facility during its operating life? 265.142(d)	<input type="checkbox"/>	<input type="checkbox"/>	_____

Financial assurance for closure:

Can the facility indicate they have established and submitted at least one of the following financial assurance mechanisms for closure cost: 265.143-

(a) Closure trust fund?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
(b) Surety bond guaranteeing payments into a closure trust fund?	<input type="checkbox"/>	<input type="checkbox"/>	_____
(c) Closure letter of credit?	<input type="checkbox"/>	<input type="checkbox"/>	_____
(d) Closure insurance?	<input type="checkbox"/>	<input type="checkbox"/>	_____
(e) Financial test and corporate guarantee for closure?	<input type="checkbox"/>	<input type="checkbox"/>	_____

(The facility may use more than one of the above (265.143(f)), and can be included with another facility (265.143(g)).

Were the financial assurance mechanisms amended as needed to cover the latest revised closure cost estimate? 265.143	<input type="checkbox"/>	<input type="checkbox"/>	_____
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*Derived from the Annual Implicit Price Deflator for Gross Nation Product as published by the U.S. Dept. of Commerce in its "Survey of Current Business."

Latest Annual Deflator = _____ Previous Annual Deflator = _____
Inflation Factor = _____ (latest deflator/previous deflator)

Current Cost Adjustment = \$ _____ (latest adjusted estimate x inflation factor)

Cost estimate for post-closure:

	Yes	No	Comments
Has a written estimate been prepared of the cost of post-closure care? 265.144(a)	<input type="checkbox"/>	<input type="checkbox"/>	
What is the amount of the post-closure cost estimate?	\$		
Was the estimate calculated by multiplying a detailed estimate of annual costs by 30 years of post-closure care? 265.144(a)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
Does the annual care cost estimate cover all the activities in the post-closure plan? 265.144(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Is the estimate based on the costs of hiring a third party (not a subsidiary or parent corporation) to close the facility? 265.144(a)(1)	<input type="checkbox"/>	<input type="checkbox"/>	
Has the post-closure cost estimate been adjusted annually? 265.144(b)	<input type="checkbox"/>	<input type="checkbox"/>	
If the closure cost adjustment was not made by recalculating the cost in current dollars was the adjustment made by using an inflation factor? 265.144(b)(1-2)	<input type="checkbox"/>	<input type="checkbox"/>	
During the active life of the facility, was the cost estimate revised no later than 30 days after a revision to the post-closure plan increases the cost of post-closure care? 265.144(c)	<input type="checkbox"/>	<input type="checkbox"/>	
(Revised estimate must be adjusted for inflation.)			
Are the latest post-closure cost estimate and adjusted cost estimate kept at the facility during its operating life? 265.144(d)	<input type="checkbox"/>	<input type="checkbox"/>	

Financial assurance for post-closure:

Can the facility indicate they have established and submitted at least one of the following financial assurance mechanisms for post-closure care: 265.145-

(a) Post closure trust fund?

☒

Cont'd. - Fin. Assur. for Post-Closure

	Yes	No	Comment
(b) Surety bond guaranteeing payment into a post-closure trust fund?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(c) Post-closure letter of credit?	<input type="checkbox"/>	<input type="checkbox"/>	
(d) Post-closure insurance?	<input type="checkbox"/>	<input type="checkbox"/>	
(e) Financial test and corporate guarantee for post-closure care?	<input type="checkbox"/>	<input type="checkbox"/>	
(The facility may use more than one of the above (265.145(f)), and can be included with another facility (265.145(g)).			
Were the financial assurance mechanisms amended as needed to cover the latest revised post-closure cost estimate? 265.145	<input type="checkbox"/>	<input type="checkbox"/>	
If the facility chose to satisfy the requirements for financial assurance for both closure and post-closure care by a single mechanism, did the sum of funds available at least equal what the total would be for separate mechanisms? 265.146	<input type="checkbox"/>	<input type="checkbox"/>	
<u>SCREENING FOR LIABILITY REQUIREMENTS:</u>			
Has the facility submitted a demonstration of liability coverage to third parties for sudden accidental occurrences? 265.147(a)	<input type="checkbox"/>	<input type="checkbox"/>	<i>not determined</i>
Did the sudden accident coverage consist of at least \$1 million per occurrence and \$2 million per year exclusive of legal defense costs? 265.147(a)	<input type="checkbox"/>	<input type="checkbox"/>	
Was the sudden accident coverage demonstrated by having: 265.147(a)-			
(1) Liability insurance?	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Financial test or corporate guarantee?	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Surety bond for liability?	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Trust fund for liability?	<input type="checkbox"/>	<input type="checkbox"/>	
(5) A combination of the above?	<input type="checkbox"/>	<input type="checkbox"/>	

Cont'd., Fin. Assur.

Yes

No

Comments

If demonstrated by having liability insurance, was one or both of the following attached: 265.147(a)(1)(i)*

Hazardous Waste Facility Liability Endorsement? _____

Certificate of Liability Insurance? _____

If the facility operates a HW surface impoundment, landfill, or land treatment facility, have they also submitted a demonstration of liability coverage for non-sudden accidental occurrences? 265.147(b) _____

Did the non-sudden accidental coverage consist of at least \$3 million per occurrence and \$6 million per year? 265.147(b) _____

Was the non-sudden accident coverage demonstrated by having: 265.147(b)-

(1) Liability insurance? _____

(2) Financial test or corporate guarantee? _____

(3) Letter of credit for liability? _____

(4) Surety bond for liability? _____

(5) Trust fund for liability? _____

(6) A combination of the above? _____

If demonstrated by having liability insurance, was one or both of the following attached: 265.147(b)(1)(i)*

HW Facility Liability Endorsement? _____

Certificate of Liability Insurance? _____

If the TSD liability coverage amounts were less than those required, has the facility obtained a variance? 265.147(c) _____

If the owner/operator has been named the debtor in a proceeding under Title 11 (Bankruptcy), U.S. Code, did they notify EPA within 10 Days of the commencement of the proceedings? 265.148 _____

ND

*In CA: DHS 8108-Liability Endorsement. DHS 8107-Liability Certificate of Insurance.

Yes No Comments

Is the guarantor or financial institution is incapacitated, has the facility owner/operator established other financial assurance or liability coverage within 60 days? 265.148(b)

ND

USE and MANAGEMENT of CONTAINERS:
(Part 265 Subpart I)

Yes No Comments

Does the facility transfer HW from containers not in good condition or leaking to containers in good condition? 265.171

✓

Are containers compatible with the HW stored in them? 265.172

Are containers stored closed? 265.173(a)

Are containers managed to prevent capture or leakage? 265.173(b)

Are containers inspected weekly for leaks and deterioration? 265.174

Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176

Are incompatible wastes stored in separate containers? 265.177(a)

Are HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)

Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)

Cont'd., CONTAINERS, 265:I

	Yes	No	Comments
Are containers or inner liners that are not empty managed as HW? 261.7(a)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>For a container to be considered empty, the facility must ensure that no more remains than:</u> 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) One inch of residue on bottom of container or inner lining? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(iii)(A) If the container is not over 110 gallons in size, 3% of weight when full?	<input type="checkbox"/>	<input type="checkbox"/>	
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:	<input type="checkbox"/>	<input type="checkbox"/>	
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	
If a container (or liner removed from the container) has held an acute HW, it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) Cleaned by another proven removal means? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(iii) For the container, the liner prevented contact and has since been removed?	<input type="checkbox"/>	<input type="checkbox"/>	

See also 40 CFR 265.31.

*TSDs that generate HW also must comply with 262 regs. An Accumulation Areas checklist follows on pages 43A, 43B, and 43C.

ACCUMULATION AREAS & CONTAINERS

Accumulation if Less than 55 gallons

The generator may accumulate at or near the point of initial generation: up to 55 gals of H.W., or one quart of acutely hazardous waste, provided:

The containers are marked either with the words "Hazardous Waste" or labels that identify the contents? 262.34(c)(1)(ii)
AND

The containers are in good condition
265.171.

AND

The containers are compatible with the waste 265.172.

AND

The containers are stored closed
265.173(a).

AND

The containers must not be opened, handled or stored in a manner which may rupture the container or cause it to leak 265.173(b).

Accumulation if greater than 55 gallons

Are containers visibly marked with:

The date that the waste accumulation started?
262.34(a)(2)

The words "hazardous waste"? 262.34(a)(3)

If the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a).

[illegible]

Does the generator comply with the requirements of 40 CFR Part 265: Subpart C for Preparedness and Prevention listed below.

Does the facility have the following equipment where applicable: 265.32-

(a) Internal communications or alarm system capable of providing immediate emergency instruction?

(b) Telephone or 2-way radios at the scene of operation?

(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?

(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?

Are the systems and equipment listed above tested? 265.33.

Do all personnel have immediate access to the systems and equipment listed in 265.32 (a)-(d)?

Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35.

Names of accumulation areas

Tanks:
(Part 265 Subpart J)

If a 100-1000 kg/mo. generator that accumulates in tanks, see Page 54.

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are tanks used to store or treat HW exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	—	—	<i>No waste storage in tanks</i>
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	—	—	
Are HW or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	—	—	
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings?	—	—	
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?	—	—	
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?	—	—	
Are <u>daily inspections</u> done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems?	—	—	
(2) Corrosion or releases of waste in above ground portions?	—	—	
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells?	—	—	
Construction materials and area surrounding the tank, including secondary containment (e.g., dikes) for erosion or signs of releases (e.g., wet spots, dead vegetation)?	—	—	

Note: If the primary purpose of this inspection is to evaluate compliance with HW storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

Cont'd., TANKS, 265:J

	Yes	No	Comments
Are sources of impressed current inspected at least every other month? 265.195(b)(2)	---	---	No tanks
Are cathodic protection systems inspected six months after initial installation and then annually? 265.195(b)(1)	---	---	
If a leak has occurred in the tank system, has the facility complied with 265.196 (p. J9)? 265.194(c)	---	---	
Ignitable and reactive waste:			
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.198(a)(1)(i-ii) or:	---	---	
Is ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.198(a)(2) or:	---	---	
Is the tank used solely for emergencies? 265.198(a)(3)	---	---	
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in table 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.198(b)	---	---	
Are incompatible wastes stored in separate tanks? 265.199(a)	---	---	
Is HW not placed in non-decontaminated tanks that previously held an incompatible waste or material? 265.199(b)	---	---	
Whenever a tank system is to be used to chemically treat or store a HW which is substantially different from waste previously handled in the tank,			

..... Ques. Cont'd on next page

Cont'd. Question; TANKS, 265:J

Yes No Comments

... or chemically treat HW with a substantially different process than was previously used, did the facility:
265.200-

(a) Conduct waste analysis and trial treatment or storage tests (bench-tests)? or:

(b) Have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions?

Construction, containment, and assessment:

Was the tank system or component used to treat HW installed after 7/14/86?
If YES, go to new tank systems (next page).

If an existing tank system (installation commenced or committed before 7/14/86) with a secondary HW containment system, go to 265.193 (p. J6)

If an existing tank system without complying secondary containment, has the facility determined whether the tank system is either not leaking or unfit for use? 265.191(a)

If found to be leaking or unfit for use, has the facility complied with 265.196 (p. J9)? 265.191(d)

If fit for use, has the facility obtained a written assessment that attests to the tank system's integrity by 1/12/88*? 265.191(a)

* Or within 12 months after their waste is listed as HW. 265.191(c)

Was the assessment on file at the facility, and certified by an independent, registered professional engineer? 265.191(a)

Did the assessment consider: 265.191(b)-

(1) Original blueprints and standards?

(2) HW characteristics?

(3) Existing corrosion protection measures?

(4) Documented age of tank, if known?

(5) Leak test, internal inspection, or integrity test results?

Design and installation of new tank systems:

Does the facility have a tank system or component that is used to treat or store HW and was installed after 7/14/86?

Has the facility obtained an assessment certified by an independent, registered, professional engineer attesting that the tank or component design is acceptable? 265.192(a)

Did the assessment include: 265.192(a)-

(1) Function and design standards?

(2) Hazardous characteristics of the wastes to be handled?

(3) Corrosion? (see next page)

(4) Protection against vehicular traffic?

(5)(i) Strength of the foundation?

(5)(ii) Anchoring to prevent flotation or dislodgement?

(5)(iii) Effects of frost heave?

Are certifications on file to attest that the installation steps and inspections, and any required repairs, were properly performed? 265.192(g)

Was there installation include before-use inspection and repair of any: 265.192(b)-

(1) Weld breaks?

(2) Punctures?

(3) Scrapes of protective coating?

(4) Cracks?

(5) Corrosion?

(6) Other damage or inadequacies?

Was the proper backfilling of underground tanks or components certified? 265.192(c)

Were all tanks tested (and repaired) for tightness? 265.192(d)

Were ancillary equipment certifiably supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, and contraction? 265.192(e)

Cont'd., TANKS, 265:J

	Yes	No	Comments
--	-----	----	----------

New tank corrosion certification:

Where the external shell of a metal tank or any metal component touches soil or water, was the tank design and installation supervised and certified by a corrosion expert?
265.192(a)(3)

Did the corrosion certification consider these factors: 265.192(a)(3)(i)-

- (A) Soil moisture content?
- (B) Soil pH?
- (C) Soil sulfides level?
- (D) Soil resistivity?
- (E) Structure to soil potential?
- (F) Influence of nearby underground metal structures or piping?
- (G) Stray electric current?
- (H) Existing corrosion-protection measures (coating, cathodic protection, etc.)?

Was at least one of the following used to ensure tank integrity: 265.192(a)(3)(ii)

- (A) Corrosion-resistant constructions materials such as special alloys fiberglass-reinforced plastic, etc.?
- (B) Corrosion-resistant coatings such as epoxy or fiberglass?
- (C) Electrical isolation devices such as insulating joints, flanges, etc.?

Was a secondary containment system provided for any: 265.193(a)

(1) New tank systems or components before installation?

(2) Existing tanks used to treat or store F020, F021, F022, F023, F026, F027, by 1/12/89?

(3) Existing tanks of proven age, by the later of 1/12/89 or 15 years old?

Cont'd., TANKS, 265:J

	Yes	No	Comments
(4) <u>Existing tanks of undocumented age</u> , by 1/12/95, or if the facility was built before 1980, by the later of 1/12/89 or the facility reaching 15 years of age?	_____	_____	_____
(5) Tank systems that handled materials that became hazardous wastes after 1/12/87, within two years of regulation or the facility reaching 15 years of age?	_____	_____	_____
If NO, to any of the above, has a variance been obtained from the RA?	_____	_____	_____
265.193(g)			
Are the <u>containment systems</u> : 265.193(b)-			
(1) Designed, installed, and operated to prevent any releases to soil or water at any time during operation? and:	_____	_____	_____
(2) Capable of detecting, collecting, and holding releases from the tank?	_____	_____	_____
To meet these requirements, are the containment systems: 265.193(c)-			
(1) Compatible with wastes handled, and strong enough to prevent failure due to pressure (including ground water), weather, installation, or daily operations?	_____	_____	_____
(2) Placed on a foundation that withstands settlement, compression, or uplift?	_____	_____	_____
(3) Provided with a leak detection system that detects any releases within 24 hours (if possible)?	_____	_____	_____
(4) Sloped or drained to remove all liquids within 24 hours (if possible)?	_____	_____	_____
Does the <u>secondary containment for tanks</u> include one of these devices: 265.193(d)-			
(1) A liner external to the tank?	_____	_____	_____
(2) A vault?	_____	_____	_____
(3) A double-walled tank? or:	_____	_____	_____
(4) An equivalent approved by the RA?	_____	_____	_____

If an external liner is used, does it: 265.193(e)(1)-

(i) Contain 100% of the largest tank volume? _____

(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm? _____

(iii) Be free of cracks or gaps? _____

(iv) Capable of preventing lateral and vertical migration of waste? _____

If a vault system is used, does it: 265.193(e)(2)-

(i) Contain 100% of the largest tank volume? _____

(ii) Either prevent run-off or rain from entering, or have added capacity to contain a 25-year, 24-hours storm? _____

(iii) Have any joints sealed? _____

(iv) Have an impermeable liner or coating over the concrete? _____

(v) Protect against vapor formation from ignitable or reactive wastes? _____

(vi) Have an exterior moisture barrier to prevent seep-in? _____

If a double-walled tank is used, is it: 265.193(e)(3)-

(i) One integral structure? _____

(ii) Protected from interior and exterior corrosion? _____

(iii) Provided with a leak detection system capable of detecting a leak within 24 hours (if possible)? _____

Is all ancillary equipment provided with full secondary containment e.g., trench, jacketing, double-walled pipe (except for the following if inspected daily for leaks): 265.193(f)-

(1) Above ground pipes? _____

(2) Welded flanges, joints, and connections? _____

(3) Seal-less or magnetic coupling pumps? _____

(4) Pressurized above ground piping systems w/automatic shut-off devices? _____

Cont'd., TANKS 265:J

Yes No

Comments

Leaks, spills, unfit-for-use tanks:

If a tank system or secondary containment system has had a leak or spill, or is unfit for use, was it immediately removed from service? 265.196

Did the facility immediately stop the flow of HW into the system, and inspect to determine the cause of the release? 265.196(a)

If the release was from the tank system, within 24 hours of detection (if possible) did they remove enough waste to prevent further release and allow inspection and repair? 265.196(b)

If the release was to a secondary containment system, were all released materials removed in 24 hours? 265.196(b)(2)

If the release was to the environment, did the facility immediately conduct a visual inspection of the release? 265.196(c)- and:

(1) Contain it to prevent further migration to soils or surface water?

(2) Remove and properly dispose of any visible contamination of the soil or surface water?

Was the leak or spill of HW: 265.196(d)(2)-

(i) Less than or equal to one pound? and,

(ii) Immediately contained and cleaned up?

If not, was the spill or leak reported to the RA within 24 hours? 265.196(d)(1)

If the reportable leak was a release to the environment, was a full report submitted to the RA within 30 days of detection? 265.196(d)(3)

Cont'd., TANKS, 265

Yes

No

Comments

Did the environmental release report include: 265.196(d)(3)-

(i) Likely route of migration? _____

(ii) Characteristics of the surrounding soil composition, geology, hydro-geology, and climate? _____

(iii) Results of any monitoring or sampling? (See next page for continued question) _____

If not, were the results forwarded to the RA as soon as the analysis was received? _____

(iv) Proximity to downgradient drinking water, surface water, and population areas? _____

(v) A description of response actions taken or planned? _____

Repair, containment, or closure:

If the cause of the release was a spill that did not damage the integrity of the system was waste removed and necessary repairs made before returning the system to service? 265.196(e)(2) _____

If the cause of the release was a leak from the primary tank system into the secondary tank system, was the system repaired before returning to service? 265.196(e)(3) _____

If the source of any leak to the environment was from an aboveground, visually accessible component, was it repaired and certified before being returned to service? 265.196(e)(4) _____

If the source of any leak to the environment was from a component or tank without secondary containment, and was below ground (or above ground but not readily accessible for visual inspection, e.g., the bottom of an onground tank), was the tank or entire component provided with secondary containment (265.193) before being returned to service? 265.196(e)(4) _____

Cont'd., TANKS, 265:J

	Yes	No	Comments
If the answer to any of the above four questions was NO, did the facility close the unit in accordance with 265.197 265.196(e)(1)	_____	_____	_____
If the facility has extensively repaired a tank system that leaked, was the repaired system certified capable by an independent, registered professional engineer? 265.196(f)	_____	_____	_____
Was the certification submitted to the RA within 7 days after returning the system to use? 265.196(f)	_____	_____	_____
If a tank system or component was replaced, did it comply with 265.192, new tanks ? 265.196(e)(4)	_____	_____	_____
<u>Tank closure and post-closure care:</u>			
At closure, did the facility remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), structures, soil, and equipment? 265.197(a)	_____	_____	_____
If the facility demonstrated that all contaminated soils cannot be removed or decontaminated, did they close the tank and perform post-closure care as if a landfill? 265.197(b)	_____	_____	_____
If the facility has a tank system without complying secondary containment or an exemption, did they include contingent closure and post-closure plans covering the care and reporting provisions for landfills? 265.197(c)(1-2)	_____	_____	_____
Did they include the contingent plans in the cost estimate? 265.197(c)(3)	_____	_____	_____
Did they include the contingent plans' costs in the financial assurance and responsibility estimates? 265.197(c)(4-5)	_____	_____	_____

See also Subparts G, H.

Generators of Between 100 and 1,000 kg/month that accumulate HW in Tanks
(Part 265, Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
For HW generators of between 100-1000 kg./mo. that accumulate in tanks for less than 180 days*, and do not accumulate over 6000 kg. on-site at any time: 265.201(b) (*Or 270 days if they must ship the HW over 200 miles.)	___	___	<u>No Tanks</u>
(1) Does treatment or storage of HW in tanks comply with 265.17(b)?	___	___	
(2) Are HW or treatment reagents not placed in a tank if they could cause the tank or inner liner to fail?	___	___	
(3) Do uncovered tanks have at least 2 feet (60 centimeters) of freeboard or overflow containment capacity equal to the volume of the top 2 feet?	___	___	
(4) Where HW is continuously fed into a tank, is there a means to stop inflow?	___	___	
Does the 100-1000 kg./mo. generator inspect the following: 265.201(c)	___	___	
(1) Discharge control equipment (waste feed cut-off and by-pass systems, drainage systems) daily?	___	___	
(2) Data from monitoring equipment (pressure and temperature gauges) daily?	___	___	
(3) Waste levels in tanks daily?	___	___	
(4) Tank construction materials for corrosion or leaking fixtures and seams weekly?	___	___	
(5) Construction materials and area surrounding the tank, including secondary containment (dikes) for erosion or signs of releases (wet spots, dead vegetation) weekly?	___	___	
Are ignitable or reactive waste not placed in a tank unless: 265.201(e) (1)			
(i) The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the			...Question continue on next page..

Cont'd., TANKS, 100-1000 Kg/mo.	Yes	No	Comments
...resulting waste no longer meets the definition of ignitability or reactivity? or:	_____	_____	_____
(ii) The waste is stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? or:	_____	_____	_____
(iii) The tank is used solely for emergencies?	_____	_____	_____
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.201 (e) (2)	_____	_____	_____
Unless 265.17 (b) is complied with: 265.201 (f)			
(1) Are incompatible wastes stored in separate tanks?	_____	_____	_____
(2) Is HW not placed in unwashed tanks that previously held an incompatible waste or material?	_____	_____	_____

SURFACE IMPOUNDMENTS:
(Part 265 Subpart K)

	Yes	No	Comments
Has the facility installed two or more liners and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received HW after 5/8/85? 265.221(a) or:	_____	_____	<i>No Surface Impoundments</i>
Has the RA approved a waiver? 265.221(c-d)	_____	_____	
For existing interim status HW surface impoundments not covered above, did the facility retrofit the impoundment by 11/8/88? HSWA 3005(j)(1) or:	_____	_____	

Cont'd., SURFACE IMPOUNDMENTS

Yes

No

Comments

Did the facility cease accepting HW by 11/8/88* and submit a closure plan?
HWA 3005(j)

NA

If the facility did install double liners and a leachate collection system, did the facility notify the RA at least 60 days prior to receiving waste in the impoundment?
265.221(b) and:

Within six months of submitting this notice, file a Part B application?
265.221(b)

Do impoundments have at least two feet of freeboard? 265.222(a); or

Does the facility have on site an engineer's certification stating what alternative design features prevent overtopping of the dike? 265.222(b)

Is the freeboard level inspected at least daily? 265.226(a)

Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity? 265.223

*The facility may continue to treat in surface impoundments waste in place before 11/8/88, and may place wastes removed for retrofitting or closure activities back into the same impoundment they were removed from.

Is the impoundment, including dikes and surrounding vegetation, inspected weekly to detect leaks, deterioration, or failure? 265.226(b)

Before in impoundment is used to chemically treat a HW which is substantially different from waste previously treated in that impoundment, or chemically treat HW with a substantially different process than was previously used, did the facility: 265.225(a)(1-2)

(i) Conduct waste analysis and trial treatment test (bench or pilot plant scale)?

or:

Cont'd., Surface Impoundments, 265:K

	Yes	No	Comments
(ii) Obtain written documentation on similar treatment of similar waste under similar operating conditions?	—	—	NN
Are incompatible wastes or materials not placed in the same impoundment unless 265.17(b) is complied with? 265.230	—	—	
■ Prior to placement of ignitable or reactive waste in surface impoundment, has waste and surface impoundment satisfied all applicable requirements of Part 268? 265.229	—	—	
Are ignitable or reactive wastes treated, rendered or mixed, before or immediately after placement in the impoundment, so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitability or reactivity? 265.229(a)(1-2) or:	—	—	
A signed certification by a chemist or engineer is kept on site that the waste is handled in such a way that it is protected from conditions that may cause the waste to ignite or react? 265.229(b)(1-3) or:	—	—	
Is the impoundment used solely for emergencies? 265.229(c)	—	—	
At closure, has the facility removed or decontaminated, and managed as a HW all: 265.228(a)(1)	—	—	
Waste residues?	—	—	
Containment system components?	—	—	
Contaminated subsoils?	—	—	
Structures and equipment contaminated with waste and leachate?	—	—	
Has the facility closed the impoundment and managed it like a landfill (under Subpart G and 265.310) including: 265.228(a)(2)	—	—	
(i) Eliminating free liquids by removing wastes or solidifying the remaining wastes and residues?	—	—	

Cont'd, Surface Impoundments, 265:K

	Yes	No	Comments
(ii) Stabilized remaining wastes to a bearing capacity sufficient to support the final cover?	___	___	NA
Has the facility installed a final cover that: 265.228(a)(2)(iii)			
(A) Provides long-term minimization of liquid migration?	___	___	
(B) Functions w/minimum maintenance?	___	___	
(C) Promotes drainage and minimizes erosion or abrasion of the cover?	___	___	
(D) Accommodates settling and subsidence to maintain cover integrity?	___	___	
(E) Has a permeability less than or equal to the bottom liner or natural subsoils?	___	___	
Where wastes, waste residues, or contaminated material remain after closure, <u>during post-closure care</u> (in addition to Subpart G and 265.310 requirements) has the facility: 265.228(b)-			
(1) Maintained the integrity and effectiveness of the final cover, and made repairs as necessary?	___	___	
(2) Maintained and monitored the ground water monitoring system (and complied with all other applicable Subpart F requirements)?	___	___	
(3) Prevented run-on and run-off from eroding or damaging the final cover?	___	___	

NOTES:

Additional surface impoundment operating, record keeping, and waste analysis requirements are detailed in the Part 268: LDR checklist.

LDR wastes removed during closure or retrofitting are considered newly generated unless wastes are returned to the same impoundment from which they were removed. Otherwise, any LDR effective dates apply.

WASTE PILES:
(Part 265 Subpart L)

	Yes	No	Comments
Are waste piles covered or protected from dispersal by wind? 265.251	—	—	NA
Is a representative sample of waste from each incoming movement analyzed to determine its compatibility with other waste in the pile? unless: 265.252	—	—	/
(1) All pile-able wastes the facility receives are compatible? or:	—	—	
(2) The waste received is compatible with the waste already in a pile?	—	—	
Is the analysis adequate to avoid inadvertent mixing of incompatibles in piles? 265.252	—	—	
Does the analysis include a visual comparison of color and texture? 265.252	—	—	
For waste piles where the leachate or run-off from the pile is a HW: 265.253(a)-			
(1) Is the pile placed on an impermeable base that is compatible with the waste?	—	—	
(2) Is there a run-on control system capable of handling a 25-year storm?	—	—	
(3) A run-off control system capable of handling a 24-hour, 25-year storm?	—	—	
(4) Are collection and holding units (tanks and basins) for run-on and run-off promptly emptied or managed to maintain design capacity?	—	—	
If NO to (1)-(4) above, is: 265.253(b)-			
(1) The pile protected from precipitation and run-on by some other means (roof)? and:	—	—	
(2) Are no liquids, or wastes containing free liquids, placed in the pile?	—	—	
Has the facility installed a liner and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received waste after 5/8/85? 265.254	—	—	

Cont'd., WASTE PILES

	Yes	No	Comments
For facilities that add ignitable or reactive wastes to an existing pile, can they demonstrate that: 265.256(a)-			
■ (1) Waste and waste pile have satisfied all applicable requirements of Part 268? and:			N A
(2) The resulting waste mixture no longer meets the definition of ignitable or reactive waste and the mixing will not cause uncontrolled ignition or reaction? or:			
(3) The waste is protected from materials or conditions that might cause them to ignite or react?			
Does the facility ensure that incompatible wastes and material are not placed in the same waste pile unless 165.17(b) is complied with? 265.257(a)			
Are piles of HW that are incompatible with materials stored nearby separated by sufficient distance or protected by some structural device, e.g., a dike, wall or berm? 265.257(b)			
Are HW not placed on the same area where incompatible wastes were previously piled, unless the area has been sufficiently decontaminated? 265.257(c)			
At closure, has the facility removed or decontaminated, and managed as HW, all: 265.258(a)			
Waste residues?			
Contaminated containment system components?			
Contaminated subsoils?			
Structures and equipment contaminated with waste and leachate?			
If NO, has closure and post-closure care as a landfill been performed? 265.258(b)			

LAND TREATMENT:
(Part 265 Subpart M)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is the HW treated in the land treatment unit capable of biological or chemical degradation? 265.272(a)	_____	_____	NA
Is there a run-on control system designed, constructed, operated, and maintained to keep flow off the active portions of the facility during peak discharge from at least a 25-year storm? 265.272(b)	_____	_____	
Is there a run-off management system designed, constructed, operated, and maintained to collect and control a volume of water at least equivalent to a 24-hour, 25-year storm? 265.272(c)	_____	_____	
Are collection and holding facilities associated with run-on/-off control systems managed to maintain the design capacity of the system? 265.272(d)	_____	_____	
Is the treatment zone managed to control particulate wind dispersal? 265.272(e)	_____	_____	
Before placing HW in or on a land treatment unit, has the facility determined the following: 265.273-			
■ (a) Concentrations in the waste of any substance that cause a waste to exhibit the Toxicity Characteristic?	_____	_____	
(b) For any waste listed in Part 261, Subpart D, the concentration of any substance which caused the waste to be listed as a HW?	_____	_____	
(c) If food chain crops are grown (see 265.276, p. M3), the concentrations in the waste of arsenic, cadmium, lead, and mercury unless written, documented data shows that the constituent is not present?	_____	_____	
<u>Unsaturated Zone Monitoring:</u>			
Has the facility implemented an unsaturated zone monitoring plan? 265.278(a)	_____	_____	

Cont'd. Land Treatment, 265:M

	Yes	No	Comments
Is the plan and the rationale used to develop the plan kept at the facility? 265.278(d)	—	—	NA
Is the plan designed to detect vertical migration of HW and HW constituents under active portions of land treatment unit? 265.278(a)(1)	—	—	
Does the plan provide information on the background concentrations of HW and HW constituents in similar but untreated soils nearby? 265.278(a)(2)	—	—	
Is the background monitoring conducted before or in conjunction with the migration monitoring? 265.278(a)(2)	—	—	
Does the plan include: 265.278(b)			
(1) Soil monitoring using soil cores?	—	—	
(2) Soil-pore water monitoring using devices such as lysimeters?	—	—	
Has the facility demonstrated in their unsaturated zone monitoring plan that: 265.278(c)-			
(1) The depth at which soil and soil-pore water samples are taken is below the depth to which the waste is incorporated into the soil?	—	—	
(2) The number of soil and soil-pore water samples to be taken is based on the variability of the HW constituents in waste, in soil, and the soil type(s)?	—	—	
(3) The frequency and timing of soil and soil-pore water sampling is based on the frequency, time, and rate of waste application, proximity to ground water, and soil permeability?	—	—	
Does the facility analyze the soil and soil-pore water samples for the same HW constituents that were found during the waste analysis? 265.278(e)	—	—	
Are records kept regarding application dates and rates, quantities, and locations of all HW placed in the land treatment unit? 265.279	—	—	

Cont'd., Land Treatment, 265:M

	Yes	No	Comments
■ Prior to application of ignitable or reactive waste to the treatment zone, have waste and zone satisfied all applicable requirements of Part 268? 265.281	—	—	NA
Are ignitable or reactive wastes immediately incorporated into the soil so that the resulting waste mixture no longer meets the definition of ignitable or reactive waste, and 265.17(b) is complied with? 265.281(a)(1-2) or:	—	—	
The waste is managed in such a way that it is protected from conditions which may cause it to ignite or react? 265.281(b)	—	—	
Does the facility ensure that incompatible wastes are not placed in the same unit, unless 265.17(b) is complied with? 265.282	—	—	
<u>Food chain crops:</u>			
Has the facility notified the RA of any land treatment units on which food chain crops are or will be grown? 265.276(a)	—	—	
Has the facility conducted field tests before food chain crops are grown on the treated area that demonstrate any arsenic, lead, mercury, or listed HW constituents? 265.276(b)(1)-	—	—	
(i) Will not be transferred to the food portion of the crop by plant uptake or direct contact, and will not be ingested by food chain animals (e.g. by grazing)? or:	—	—	
(ii) Will not occur in greater concentrations in the crops grown on the land treatment field than in crops grown on untreated soils?	—	—	
Are these test results kept at the facility?	—	—	
Did the test results include: 265.276(b)(2)-			

Cont'd., Land Treatment, 265:M

	Yes	No	Comments
(i) Evidence basing the tests on the specific waste and application rates being used at the facility?	___	___	NA
(ii) Descriptions of crop and soil characteristics, sample selection criteria, sample size determination, analytical and statistical procedures?	___	___	
If food chain crops are grown on a land treatment facility that receives waste containing cadmium, has the facility complied with the requirements of either 265.276(c)(1) or -(2)?	___	___	
265.276(c)	___	___	

Closure and Post-Closure:

Does the closure plan and post-closure plan address the following objectives and indicate how they will be achieved: 265.280(a)

(1) Control of migration of HW and HW constituents from the treatment zone into the ground water?	___	___	
(2) Control of the release of contaminated run-off from the unit into surface water?	___	___	
(3) Control of the release of airborne particulate contaminants caused by wind erosion?	___	___	
(4) Compliance with 265.276 (growth of food chain crops)?	___	___	

Were the following factors considered in addressing the closure and post-closure care objectives: 265.280(b)-

(1) Type and amount of HW and HW constituents applied to the land treatment unit?	___	___	
(2) Mobility and expected rate of migration of HW and HW constituents?	___	___	
(3) Site location, topography, and surrounding land use with respect to the potential effects of pollutant migration (e.g., proximity to ground water, surface water, and drinking water sources)?	___	___	

Cont'd., Land Treatment, 265:M

	Yes	No	Comments
4) Climate, including amount, frequency and pH of precipitation?	___	___	<u> </u>
(5) Geological and soil profiles; surface and subsurface hydrology of the site; soil characteristics, including cation exchange capacity, total organic carbon, and pH?	___	___	<u> </u>
(6) Unsaturated zone monitoring information?	___	___	<u> </u>
(7) Type, concentration, and depth of migration of HW constituents in the soil as compared to their background concentrations?	___	___	<u> </u>
Did the closure and post-closure care plan include considerations for removal of contaminated soil? 265.280(c)(1)	___	___	<u> </u>
Did the closure and post-closure care plan include considerations for the placement of the final cover? 265.280(c)(2)- including:	___	___	<u> </u>
(i) Functions of the cover (e.g., infiltration control, erosion and run-off control, and wind erosion control?	___	___	<u> </u>
(ii) Characteristics of the cover, including material, final surface contours, thickness, porosity and permeability, slope, length of run of slope and type of vegetation on the cover?	___	___	<u> </u>
Do the plans address ground water monitoring? 265.280(c)(3)	___	___	<u> </u>
Does the closure plan provide for the following during the closure period: 265.280(d)-			
(1) Continuation of the unsaturated zone monitoring program (soil-pore liquid monitoring may be terminated 90 days after the last application of waste)?	___	___	<u> </u>
(2) Maintenance of run-on control systems?	___	___	<u> </u>
(3) Maintenance of the run-off management systems?	___	___	<u> </u>

Cont'd., Land Treatment, 265:M

	Yes	No	Comments
(4) Controlling wind dispersal of particulates?	—	—	N/A
At closure, has the facility submitted to the RA a certification signed by the owner/operator and an independent soil scientist or registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan? 265.280(e)	—	—	
Does the post-closure plan provide for the following during the post-closure care period: 265.280(f)-			
(1) Continuation of the soil-core monitoring program?	—	—	
(2) Restricting access to the unit as appropriate?	—	—	
(3) Assuring that growth of food chain crops complies with 265.276?	—	—	
(4) Controlling wind dispersal of HW?	—	—	

LANDFILLS:
(Part 265 Subpart N)

	Yes	No	Comments
Has the facility installed two or more liners and leachate collections systems above and between the liners for each new unit, replacement unit, or lateral expansion of an existing unit that has received waste after 5/8/85? 265.301(a) or:	—	—	N/A
Has the RA approved a waiver? 265.301(c-d)	—	—	
If the facility did install double liners and leachate collections systems, did the facility notify the RA at least 60 days prior to receiving waste in the landfill? 265.301(b)	—	—	

Cont'd., LANDFILLS, 265:N

	Yes	No	Comments
Within six months of submitting this notice, did the facility then file a Part B application? 265.301(b)	_____	_____	_____
Is the run-on control system capable of preventing flow onto active portions during peak discharge from a 25-year storm? 265.302(a)	_____	_____	_____
Is the run-off management system capable of collecting and controlling the water volume resulting from a 24-hour, 25-year storm? 265.302(b)	_____	_____	_____
After storms are the run-on and run-off control systems returned to their design capacities? 265.302(c)	_____	_____	_____
Are HW managed to prevent wind dispersal? 265.302(d)	_____	_____	_____
Does the facility maintain the following items in the operating record: 265.309-			
(a) On a map, the exact locations, dimensions and depth of each cell with respect to permanently surveyed benchmarks?	_____	_____	_____
(b) The contents of each cell and the location of each HW type within each cell?	_____	_____	_____
Are incompatible wastes and materials not placed in the same landfill cell unless 265.17(b) is complied with? 265.313	_____	_____	_____
Requirements For Ignitable or Reactive Wastes:			
■ Except as provided in 265.312(b) (disposal in containers) or in 265.316 (disposal in labpacks) has waste and landfill satisfied all applicable requirements of Part 268 prior to placement of ignitable or reactive waste in landfill? 265.312(a)&(b)	_____	_____	_____
Are ignitable or reactive wastes treated, rendered, or mixed before or immediately after placement in the landfill so that the resulting waste,			... Question continued on next page..

Cont'd., LANDFILLS, 265:N

	Yes	No	Comments
...mixture, dissolution, or material no longer exhibits the characteristics of ignitability or reactivity, and 265.17(b) is complied with? 265.312(a)	_____	_____	_____
Requirements for Ignitable Wastes Disposed of in Containers: 265.312(b)			
Are wastes protected from materials or conditions which may cause them to ignite?	_____	_____	_____
Are wastes disposed of in non-leaking containers?	_____	_____	_____
Are wastes carefully handled and placed so as to avoid heat or sparks?	_____	_____	_____
Are wastes covered daily with soil?	_____	_____	_____
Are wastes not disposed in cells that contain other wastes which may generate heat and cause ignition?	_____	_____	_____
For facilities that accept bulk liquid hazardous wastes or wastes containing free liquids between 11/19/81 and 5/8/85, did: 265.314(a)-			
(1) The landfill have a complying liner and leachate collection and removal system? or:	_____	_____	_____
(2) Before disposal, were the liquids treated or stabilized, chemically or physically so that free liquids were no longer present?	_____	_____	_____
Have no bulk or containerized HWS containing free liquids (even if mixed with absorbents) been placed in the landfill after 5/8/85? 265.314(b)	_____	_____	_____
Have no liquids, even if not a HW, been placed in a landfill after 11/8/85, unless the RA has granted an exemption? 265.314(f)	_____	_____	_____
For landfills that accepted liquids in containers after 3/22/82, was all free-standing liquid handled by one of the following means prior to disposal: 265.314(c)-			

Cont'd. LANDFILLS, 265:N

	Yes	No	Comments
(1)(i) Removed by decanting?	_____	_____	_____
(1)(ii) Eliminated, by mixing with absorbent or solidification?	_____	_____	_____
(1)(iii) Otherwise eliminated?	_____	_____	_____
(2) Contained in an ampule or other very small container?	_____	_____	_____
(3) Held in a container designed to hold free liquids for use other than storage, such as a battery or capacitor?	_____	_____	_____
(4) In a labpack? (see also next page)	_____	_____	_____
Was the paint filter test (Method 9095, SW-846) used to make any determinations of free liquids? 265.314(d)	_____	_____	_____
Unless very small (such as an ampule), were containers either: 265.315-			
(a) At least 90% full when buried? or:	_____	_____	_____
(b) Crushed flat, shredded, or similarly reduced in volume before they are buried in the landfill?	_____	_____	_____
■ Are labpacks placed in the landfill: 265.316-			
(a) Packaged in inside containers that are:			
Non-leaking?	_____	_____	_____
Compatible with the waste?	_____	_____	_____
Securely sealed?	_____	_____	_____
In compliance with any DOT specs?	_____	_____	_____
(b)(1) Overpacked in an open head DOT spec metal drum of 110 G or less?	_____	_____	_____
(b)(2) Surrounded with a sufficient quantity of absorbent material to completely absorb all liquid contents?	_____	_____	_____
(b)(3) Packed with absorbent until the overpack drum is full?	_____	_____	_____
(c) Contain absorbent material that is compatible with the waste?	_____	_____	_____

Cont'd., LANDFILLS, 265:N

	Yes	No	Comments
(d) Not contain incompatible wastes placed in the same drum?	_____	_____	_____
(e) Are reactive wastes, other than cyanide- or sulfide-bearing wastes, treated or rendered non-reactive prior to placement in labpacks?	_____	_____	_____
(f) In compliance with Part 268? 265.316	_____	_____	_____

Closure and Post-Closure:

At final closure of the landfill or any cell, has a final cover been placed over the unit that is designed to: 265.310(a)-

(1) Provide long-term minimization of migration of liquids through the closed landfill?	_____	_____	_____
(2) Function with minimum maintenance?	_____	_____	_____
(3) Promote drainage and prevent erosion or abrasion of the cover?	_____	_____	_____
(4) Accommodate settling and subsidence to maintain the cover's integrity?	_____	_____	_____
(5) Have a permeability less than or equal to that of the bottom liner or natural subsoils?	_____	_____	_____

During post-closure, has the facility: 265.310(b)-

(1) Maintained the integrity and effectiveness of the final cover, and made repairs as necessary?	_____	_____	_____
(2) Maintained and monitored the ground water monitoring system (and complied with all other applicable Subpart F requirements)?	_____	_____	_____
(3) Prevented run-on and run-off from eroding or damaging the final cover?	_____	_____	_____
(4) Protected and maintained surveyed benchmarks?	_____	_____	_____

See also land-disposal facility closure requirements, Subparts G and H.

INCINERATORS
(Part 265 Subpart O)

	Yes	No	Comments
Does the facility operate a HW incinerator*? 265.340(a)(1-2)	___	___	N/A
Has the facility documented that no wastes expected to contain Appendix VIII constituents are burned? and: 265.340(b)	___	___	
Is documentation on site that the waste is listed as a HW solely because it is: 265.340(b) -			
(1) Ignitable and/or corrosive (Subpart D, Hazard Code I or C)?	___	___	
(2) Reactive (Code R), does not emit toxic fumes, and will not be burned along with any other HW?	___	___	
(3) Has ignitable and/or corrosive characteristics (Subpart C)?	___	___	
(4) Has a reactive characteristic (Subpart C) and is handled per Code R above?	___	___	
If YES to the previous two questions, the facility is exempt from Subpart O. See also 266, Subparts D and E.			
Does the facility conduct waste analysis for each new waste sufficient to enable them to establish necessary steady state conditions and what pollutants might be emitted? 265.341	___	___	
Does the waste analysis consider: 265.341-			
(a) Heating value?	___	___	
(b) Halogen and sulfur content?	___	___	
(c) Concentrations of lead and mercury, unless written documentation show they are not present?	___	___	
Is waste not fed to the incinerator during start-up and shut-down unless the incinerator has reached steady state conditions? 265.345	___	___	

*An incinerator is an enclosed device using controlled flame combustion; an industrial boiler or furnace used to destroy wastes by burning; or an industrial furnace for any recycling purpose that elects to be regulated under this subpart.

Cont'd., INCINERATORS, 265:0

	Yes	No	Comments
Does the facility monitor existing temperature and emission control devices every 15 minutes of operation, including those measured in: 265.347(a)			
Waste feed?	___	___	_____
Auxiliary fuel feed?	___	___	_____
Air flow?	___	___	_____
Incinerator temperature?	___	___	_____
Scrubber flow and pH?	___	___	_____
Process flow and level controls?	___	___	_____
Were appropriate corrections to maintain appropriate steady state conditions made immediately? 265.347(a)	___	___	_____
Is the complete unit, including pumps, valves, conveyors, pipes, emergency shut-down controls, system alarms etc., inspected daily for leaks, spills, and fugitive emissions? 265.347(b)	___	___	_____
Has the facility received performance certification from the EPA before incinerating: 265.352			
F020: tri- or tetrachlorophenol?	___	___	_____
F021: pentachlorophenol?	___	___	_____
F022: tetra-, penta-, or hexachlorobenzenes (alkaline conditions)?	___	___	_____
F023: wastes from F020 equipment?	___	___	_____
F026: wastes from F022 equipment?	___	___	_____
F027: discarded unused formulations of tri-, tetra-, or pentachlorophenol and derivatives?	___	___	_____
At closure, was all HW and HW residues, including ash, removed from the equipment? 265.351	___	___	_____

■ NOTE: Persons who incinerate labpacks per 268.42(c)(1) may use fiber drums place of metal outer containers provided such fiber drums meet DOT specifications in 49 CFR 173.12 and are overpacked in accordance with 265.316(b).

OTHER THERMAL TREATMENT:
(Part 265 Subpart P)

	Yes	No	Comments
Does the facility thermally treat HW in devices other than incinerators? (If "an enclosed device using controlled flame combustion", the unit is an incinerator.) 265.370	—	—	NA
If the device is a batch treatment unit, is a complete thermal cycle used to treat each batch of HW? 265.373	—	—	
If not a batch process, does the facility bring the unit up to steady state (normal) operating temperature and conditions before adding HW? 265.373	—	—	
Does the facility conduct waste analysis for each new waste sufficient to enable them to establish necessary steady state conditions and what pollutants might be emitted? 265.375	—	—	
Does the waste analysis consider: 265.375-			
(a) Heating value?	—	—	
(b) Halogen and sulfur content?	—	—	
(c) Concentrations of lead and mercury, unless written documentation shows they are not present?	—	—	
Does the facility monitor existing temperature and emission control devices every 15 minutes of operation, including those measuring: 265.377(a)(1)			
Waste feed?	—	—	
Auxiliary fuel feed?	—	—	
Treatment process temperature?	—	—	
Process flow and level controls?	—	—	
Were any corrections to maintain appropriate steady state conditions made immediately? 265.377(a)(1)	—	—	
Is the stack plume observed hourly for normal color and opacity, and any corrections made immediately? 265.377(a)(2)	—	—	

Cont'd., Other Thermal Treatment, 265:P

	Yes	No	Comments
Is the complete unit, including pumps, valves, conveyors, pipes, emergency shut-down controls, systems alarms etc., inspected daily for leaks, spills, and fugitive emissions? 265.377(a) (3)	—	—	N/A
Has the facility received performance certification from the EPA before thermally treating: 265.383	—	—	
F020: tri- or tetrachlorophenol?	—	—	
F021: pentachlorophenol?	—	—	
F022: tetra-, penta-, or hexachlorobenzenes (alkaline conditions)?	—	—	
F023: wastes from F020 equipment?	—	—	
F026: wastes from F022 equipment?	—	—	
F027: discarded unused formulations of tri-, tetra-, or pentachlorophenol and derivatives?	—	—	
At closure, was all HW and HW residues, including ash, removed from the equipment? 265.381	—	—	
Open burning of HW explosives:			
Does the facility open burn or detonate only waste explosives or military propellants? 265.382	—	—	
Do they comply with the following minimum specifications? 265.382	—	—	

Pounds of waste explosives
or propellants

0 to 100
101 to 1,000
1,001 to 10,000
10,001 to 30,000

Minimum distance from open burning or
detonation to the property of others

670 feet (204 meters)
1,250 feet (360 meters)
1,730 feet (530 meters) (5280 feet =
2,260 feet (690 meters) one mile)

CHEMICAL, PHYSICAL, and BIOLOGICAL TREATMENT:
(Part 265 Subpart Q)

	Yes	No	Comments
Does the facility treat HW by chemical, physical, or biological methods other than in tanks, surface impoundments, or land treatment facilities? 265.400	___	___	NA
Does the treatment comply with 265.17(b)? 265.401(a)	___	___	
Are HW or treatment reagents not placed in the unit if they could cause the equipment to rupture, leak, corrode, or otherwise fail? 265.401(b)	___	___	
Where HW is continuously fed into a treatment process, is there a means to stop this inflow (e.g., a waste feed cut-off or bypass system)? 265.401(c)	___	___	
Before the unit is used to chemically treat a HW which is substantially different from waste previously treated, or chemically treat HW with a substantially different process than was previously used, did the facility: 265.402(a)(1-2)			
(i) Conduct waste analysis and trial treatment tests (bench or pilot plant scale)? or:	___	___	
(ii) Obtain written documentation on similar treatment of similar waste under similar operating conditions?	___	___	
Does the facility: 265.403(a)-			
(1) Inspect any discharge control equipment (e.g., waste feed cut-off or bypass systems, drainage systems, pressure relief systems) daily?	___	___	
(2) Gather data from monitoring equipment (e.g., pressure and temperature gauge) at least daily to ensure the unit is operating correctly?	___	___	
(3) Inspect for leaking of seams and fixtures, leaks, or corrosion weekly?	___	___	
(4) Inspect discharge confinement structures (dikes) for leaks (wet spots, dead vegetation) weekly?	___	___	

Cont'd., 265:Q

	Yes	No	Comments
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in the unit so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.405(a)(1)(i) or:	—	—	NA
Is ignitable or reactive waste treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.405(a)(2)	—	—	
Are incompatible wastes or materials not placed in the same unit unless 265.17(b) is complied with? 254.406(a)	—	—	
Is HW not placed in unwashed treatment equipment that previously held an incompatible waste or material (unless 265.17(b) is complied with)? 265.406(b)	—	—	
At closure, has the facility removed all HW and HW residues from the treatment processes or equipment, discharge control equipment and confinement structures? 265.404	—	—	

RECYCLABLE MATERIALS USED IN A MANNER CONSTITUTING DISPOSAL:
(Part 266 Subpart C)

	Yes	No	Comments
Does the facility handle recyclable materials that are placed on or applied to the land? 266.20(a)(1-2) If YES,	—	✓	NA
Is the material either a commercial fertilizer, or a product produced for use by the general public? 266.20(b) and:	—	—	
The recyclable materials have been chemically bound to the commercial product, and cannot be separated by physical means? and:	—	—	

Cont'd., RECYCLING, 266

	Yes	No	Comments
The products meet the applicable treatment or prohibition standards in Part 268 Subpart D (see checklist) for each recyclable HW constituent they contain?*	—	—	NA
If NO to any of 266.20(b) above, did the facility comply with all RCRA TSD facility requirements? 266.21,-22,-23	—	—	
If the recyclable materials used in a manner constituting land disposal were subject to provisions of 266.20(b) regarding treatment standards and prohibition levels, did the recycler submit a certification (see 268.7(b)(5)), and a notice listing the EPA HW number, corresponding treatment standard, and any analysis, to the RA? 268.7(b)(8) and:	—	—	
Has the recycler kept records of the name and location of each entity receiving the waste-derived product? 268.7(b)(8)	—	—	
Has the facility not sprayed waste and/or used oil contaminated with dioxin or any other HW (except those listed solely for ignitability) on roads for dust suppression or road treatment? 266.23(b)	—	—	

*Except zinc-containing fertilizers using HW K061 that are produced for the general public's use. They are exempt. 266.20(b)

Hazardous Waste Burned for Energy Recovery:
(Part 266 Subpart D)

	Yes	No	Comments
Does the facility handle hazardous wastes (including fuels produced from HW by blending, processing, or other treatment) that are burned for energy recovery in a boiler or industrial furnace? 266.30(a)	—	—	NA
Are these HW fuels exempt from this Subpart because they are: 266.30-			

Cont'd., RECYCLING, 266

	Yes	No	Comments
(a) Gas recovered from HW management activities and burned for energy recovery?	—	—	N/A
(b)(1) Used oil that is a HW solely because it exhibits a Part 261 Subpart C characteristic? (See 266 Subpart E, Used Oil Burned for Energy Recovery.)	—	—	
(b)(2) Wastes that are exempt under Part 261.4 (Exclusions), or 261.6(a)(3)(v-ix)?	—	—	
(b)(2) From conditionally-exempt small quantity generators (261.5)?	—	—	
Does the facility ensure that no fuel which contains HW is burned in any cement kiln which is located within the boundaries of any incorporated municipality with a population >500,000 unless the kiln fully complies with incinerator regulations? 266.31(c)	—	—	
If the facility generates or initiates a shipment of HW fuel, have they complied with Part 262 (generator) requirements? 266.32(a) and 266.34(d)	—	—	
If the facility transports HW fuel or HW used to produce a fuel, have they complied with Part 263 (transporter) requirements? 266.33	—	—	
If the facility stores HW fuel, have they complied with all applicable HW storage facility regulations? 266.34(c), 266.35(c)(1-3)	—	—	

*Except incinerators regulated under 265 Subpart O. Boilers must meet the specifications defined on Page 88, "260.10 DEFINITIONS - (Part 266)"

Cont'd., HW BURNED for ENERGY RECOVERY: 266-D

Yes No Comments

Marketers:

Does the facility market HW fuel?

(e.g., generators who market HW fuel directly to a burner, distributors of HW fuel, facilities that received HW from generators and produce, process, or blend HW fuel) 266.34

Have they notified the EPA of their HW fuel activity (even if they previously notified of other HW management and received an EPA ID#)? 266.34(b)

Before they initiate the first shipment of HW fuel to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:

The burner or marketer has notified EPA and identified his waste-as-fuel activities? 266.34(a), 266.34(e)(1)(i)

If the recipient is a burner, the burner will burn HW fuel only in a unit identified in 266.31(b)(p. D3)? 266.34(a), 266.34(e)(1)(ii)

Before a marketer accepts the first shipment of HW fuel from another marketer, has he provided the other marketer with the notice described above? 266.34(e)(2)

Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in HW fuel transactions with each person? 266.34(f)

Has the facility* that burns HW fuel: 266.35-

(a) Met 266.31(b) below?

(b) Notified the EPA of their HW fuel activity (even if they previously notified of other HW management and received an EPA ID#)? 266.35(b)

Cont'd., Recycling-Burning, 266:D

	Yes	No	Comments
Before the burner accepts the first shipment of HW fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.35(d)			
(1) He has notified EPA and identified his waste-as-fuel activities?	_____	_____	_____
(2) He will burn the fuel only in a unit identified in 266.31(b) below?	_____	_____	_____
Has the burner kept copies of each certification notice sent to a marketer for three years from the date he last received HW fuel from the marketer? 266.35(e)	_____	_____	_____

Prohibitions:

Hazardous waste fuel may be burned for energy recovery in only the following devices: 266.31(b)

- (1) Industrial furnaces, as defined in 260.10
- (2) Boilers, as defined in 260.10 that are identified as follows:

(i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or

(ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale.

*Includes generator that burn their own HW fuel on-site.

USED OIL BURNED FOR ENERGY RECOVERY
(Part 266 Subpart E)

	Yes	No	Comments
Does the facility handle used oil burned for energy recovery in any boiler or industrial furnace (except 265 Subpart O incinerators)?* 266.40(a)	_____	_____	_____ NA _____

Cont'd., 266: Subpart E

Yes No Comments

Does the used oil fuel burned for energy recovery meet the qualifications: 266.40-

Contains HW from conditionally exempt small quantity (261.5) generators only? -(d)(2) or:

Has not been mixed with HW and exhibits only 261 Subpart C HW characteristics? -(c), -(d)(1)

and:

Contains no more than 1,000 ppm total halogens?** -(c)

If NO, the used oil is a HW fuel. Go to 266 Subpart D. 266.40(c)-(d)(2)

USED OIL EXCEEDING ANY SPECIFICATION LEVEL IS SUBJECT TO THIS SUBPART WHEN BURNED FOR ENERGY RECOVERY***

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
ARSENIC (As).....	5 ppm maximum
CADMIUM (Cd).....	2 " "
CHROMIUM (Cr).....	10 " "
LEAD (Pb).....	100 " "
FLASH POINT.....	100 oF minimum
TOTAL HALOGENS.....	4,000 ppm maximum**

*"Used oil" means any oil that has been refined from crude oil, used, and as a result of such use, is contaminated by physical or chemical impurities. "Used oil fuel" includes any fuel produced from used oil by blending, processing, or other treatment. 266.40(a) See also p. -266: Definitions-.

**Used oil containing >1,000 ppm total halogens is presumed to be a HW (due to mixing with other HWs) until successfully rebutted (i.e., demonstrated not to contain Appendix VIII halogenated hazardous constituents).

***The specifications do not apply if mixed with any HW not from a conditionally exempt SQG.

Cont'd, Used Oil Burned for Energy Recovery: - (Part 266 Subpart E)

Yes No Comments

* Does the facility market* used oil fuel? 266.43(a)

* e.g., generators who market used oil fuel directly to a burner, distributors of used oil fuel, facilities that receive used oil from generators and produce, process, or blend used oil fuel.

Is the facility exempt from marketer regs. because they: 266.43(a)-

(1) Are used oil generators, or collectors who transport used oil received only from generators, who do not market directly to a person who burns it for energy recovery? or:

(1) Market to burners who are only burning some of the used oil fuel incidentally to processing or other treatment before they then market? or:

(2) Only market used oil fuel that another facility has already claimed meets the specifications?

If the facility is the first to claim the used oil meets specifications (and is thus exempt) have they: 266.43(b)(1), -(6)-

(i) Kept copies of the analysis or determination for 3 years?

(ii) Recorded in an operating log:

(A) The name and address of the facility receiving the shipment?

(B) The quantity delivered?

(C) The date of shipment/delivery?

(D) A cross reference to the analysis?

Have they notified EPA of their used oil management activity, even if they previously notified of other HW management and received an EPA ID#? 266.43(b)(3)

Cont'd., Used Oil Burned for Energy Recovery: Part 266 Subpart E

	Yes	No	Comments
Before they initiate the first shipment of <u>off-spec. used oil</u> to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			
The burner or marketer has notified EPA as above? 266.41(a), 266.43(b)(5)(A)	—	—	NA
If the recipient is a burner, the burner will burn the fuel only in a unit identified in 266.41(b) (p. E4)? 266.43(a), -(b)(5)(B)	—	—	
Before a marketer accepts the first shipment of off-spec. used oil from another marketer, has he provided the other marketer with the notice just described? 266.43(b)(5)(B)(ii)	—	—	
Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in off-spec. used oil transactions with each person? 266.43(b)(6)(ii)	—	—	
Before the facility initiates a shipment of off-spec. used oil, did they send an invoice to the receiving facility containing: 266.43(b)(4)-			
(i) An invoice number?	—	—	
(ii) The sender & receiver's ID #s?	—	—	
(iii) The names & address of both facilities?	—	—	
(iv) The quantity of off-spec. used oil to be delivered?	—	—	
(v) The dates of shipment/delivery?	—	—	
(vi) The following statement: "This used oil is subject to EPA regulation under 40 CFR Part 266"?	—	—	
Has the facility kept copies of invoices received or sent for three years? 266.43(6)(ii)	—	—	

Cont'd., Used Oil Burned for Energy Recovery: Part 266 Subpart E

<u>Burners:</u>	Yes	No	Comments
Has the facility that burns off-spec. used oil fuel: 266.44-			
(a) Met 266.41(b) below?	_____	_____	_____
(b) Notified the EPA stating their location and describing their used oil management activity (even if they previously notified of other HW management and received an EPA ID No.)*? 266.43(b)	_____	_____	_____
Before the burner accepts the first shipment of off-spec. used oil fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.44(c)-			
(1) He has notified EPA as required?	_____	_____	_____
(2) He will burn the fuel only in a unit identified in 266.41(b) below?	_____	_____	_____
Has the burner kept copies of the one-time certification notice for three years after he last received oil from the marketer? 266.44(e)	_____	_____	_____
Has the burner kept copies of each invoice received for 3 years? 266.44(e)	_____	_____	_____
If the facility burns their own used oil fuel, have they either complied with all burner requirements or obtained analysis documenting that the used oil meets specifications? 266.44(d)(1)	_____	_____	_____
If the burner treats off-spec. used oil by processing, blending, or other treatment to meet the specifications, have they obtained analysis documenting that the used oil now meets specifications? 266.44(d)(2)	_____	_____	_____
Has the burner kept the analysis for three years? 266.44(e)	_____	_____	_____

*Except facilities using oil-fired space heaters under 266.41(b)(2).

Prohibitions:

Off-specification used oil may be burned for energy recovery only in the following devices: 266.41(b)-

- (1) Industrial furnaces, as defined in 260.10 (see p. -266: Definitions-).
- (2) Boilers, as defined in 260.10 (see p. -266: Definitions-), that are identified as follows:
 - (i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or
 - (ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale; or
 - (iii) Used oil-fired space heaters provided that:
 - (A) The heater burns only used oil that the owner/operator generates or used oil received from do-it-yourself oil changers who generate used oil as household waste;
 - (B) The heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and
 - (C) The combustion gases from the heater are vented to the ambient air.

RECYCLABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY
(Part 266 Subpart F)

	Yes	No	Comments
Does the facility generate, transport, or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? 266.70(a)	___	___	_____ NA
Has the facility complied with the applicable requirements of: 266.70(b)-			
(1) RCRA 3010 Notifications?	___	___	_____

Cont'd., Reclamation, 266 F

	Yes	No	Comments
(2) Subpart B of 262 (generators)?	_____	_____	_____
263.20 & 263.21 (transporters)?	_____	_____	_____
265.71 & 265.72 (storers)?	_____	_____	_____

If the facility stores these materials, have they kept the following records to document they are not accumulating speculatively? 266.70(c) -

(1) Volume of materials stored at the beginning of the calendar year? _____

(2) Amount of materials generated or received during the calendar year? _____

(3) Amount of materials remaining at the end of the calendar year? _____

Was the amount recycled (or transferred to another facility for recycling) during the year at least 75% of the amount stored at the beginning of the year? 261.1(c)(8) _____

Amount at beginning of year	_____	X	.75	_____
Plus				
Amount generated or received	_____			
Minus				
Amount remaining at end of year	_____			
Equals				
Amount recycled during year	_____		greater than or equal to above?	

If NO, the facility was accumulating speculatively and all the RCRA HW provisions apply. 266.70(d)

SPENT LEAD ACID BATTERIES BEING RECLAIMED
(Part 266 Subpart G)

	Yes	No	Comments
Does the facility store spent batteries that are recyclable materials before reclaiming them? 266.80(a)	<input checked="" type="checkbox"/>	_____	_____

If YES, has the facility notified under RCRA 3010? 266.80(b)(1)

<input checked="" type="checkbox"/>	_____	_____
-------------------------------------	-------	-------

ont's., 266 G, Lead Acid Batteries

ve they complied with Part 264
bparts A-E, F-L except for: waste
alysis (264.13) and manifests
64.71-2))? 266.80(b)(2)

Yes	No	Comments
<input checked="" type="checkbox"/>	<input type="checkbox"/>	

260.10 DEFINITIONS (Part 266)

"Boiler" means an enclosed device using controlled flame combustion and having the following characteristics:

(1)(i) The unit must have physical provisions for recovering and exporting thermal energy in the form of steam, heated fluids, or heated gases; and

(ii) The unit's combustion chamber and primary energy recovery sections(s) must be of integral design. To be of integral design, the combustion chamber and the primary energy recovery sections(s) (such as waterwalls and superheaters) must be physically formed into one manufactured or assembled unit. A unit in which the combustion chamber and the primary energy recovery sections(s) are joined only by ducts or connections carrying flue gas is not integrally designed; however, secondary energy recovery equipment (such as economizers or air preheaters) need not be physically formed into the same unit as the combustion chamber and the primary energy recovery section. The following units are not precluded from being boilers solely because they are not of integral design: process heaters (units that transfer energy directly to a process stream), and fluidized bed combustion units; and

(iii) While in operation, the unit must maintain a thermal energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel; and

(iv) The unit must export and utilize at least 75 percent of the recovered energy, calculated on an annual basis. In this calculation, no credit shall be given for recovered heat used internally in the same unit. (Examples of internal use are the preheating of fuel or combustion air, and the driving of induced or forced draft fans or feedwater pumps); or

(2) The unit is one which the Regional Administrator has determined, on a case-by-case basis, to be a boiler, after considering the standards in 260.32.

"Industrial furnace" means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame devices to accomplish recovery of materials or energy:

- (1) Cement kilns
- (2) Lime kilns
- (3) Aggregate kilns
- (4) Phosphate kilns
- (5) Coke ovens
- (6) Blast furnaces
- (7) Smelting, melting, and refining furnaces (including pyrometallurgical devices such as cupolas, reverberator furnaces, sintering machine, roasters, and foundry furnaces)
- (8) Titanium dioxide chloride process oxidation reactors
- (9) Methane reforming furnaces
- (10) Pulping liquor recovery furnaces
- (11) Combustion devices used in the recovery of sulfur values from spent sulfuric acid.

LAND DISPOSAL RESTRICTIONS:
(Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal since its effective prohibition date:*			
268.1(b) (See Attachment B for listings from 261, Subpart D)			
F001 through F005 spent solvents?	✓	_____	_____
F020 through F026-28 Dioxins?	_____	_____	_____
"California List" wastes?	_____	_____	_____
1st, 2nd, or 3rd 3rds?	_____	_____	_____
Toxicity Characteristic wastes?	_____	_____	_____
<p>■ <u>Exemptions:</u> Are the restricted wastes exempted from land disposal restrictions because:</p> <p>They are hazardous only by characteristic and disposed into a non-hazardous or hazardous injection well as defined in Part 144.6(a) and do not exhibit any prohibited characteristic of hazardous waste at point of injection?</p> <p>268.1(c) (3) _____</p> <p>An "imminent endangerment" waiver has been granted under 121(d) (4) of CERCLA? 268.1(d) _____</p> <p>The waste is from conditionally-exempt small quantity generators? 268.1(e) (1) _____</p> <p>A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(e) (2) _____</p> <p>EPA has not promulgated land disposal prohibitions or treatment standards for wastes identified or listed as hazardous after November 8, 1984? 268. (e) (3) _____</p>			

■ *Land disposal means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault or bunker for disposal purposes. 268.2(c) Injection wells are being covered under a separate schedule (Part 148).

Cont'd., LDR, 268:

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

Yes No Comments

■ Exceptions:

Can the restricted wastes continue to be land disposed because:

A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled?

See 268.1(c)(1-4), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.35(i)(4)(3rd 3rd), and 268.1(c)(2).

An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)

If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.

Except for characteristic wastes subsequently discharged under NPDES permit or in compliance with pre-treatment requirements under Section 307 of the CWA, has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3

STORAGE:

Are restricted wastes only being stored where: 268.50-

(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?

(a)(2) A TSD is accumulating a batch as above? and:

(i) Each container is marked with the contents and accumulation start date?

(ii) Each tank is marked with the contents, accumulation start date, quantity of HW, and/or the information is in the operating record?

Cont'd., LDR, Storage

Yes No

Comments

(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation? _____

none

or:

(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation wide variance, or a valid "soft hammer" 268.8 certification? _____

(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards? _____

(f) After 7/8/87, are liquid HW over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area? _____

See "Off-site storage facility record keeping requirements."

Generators: Waste Analysis

If restricted wastes are generated on-site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a) ☒ _____

Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i) ☒ _____

Did the generator determine if liquid CA list wastes sludges and solids were CA list liquids? 268.32(j)(1) ☒ _____

Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2) ☒ _____

■ Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.41, and -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.35(j) ☒ _____

Note: See Attachs. B, C, D, E, F, G for above referenced tables.

Cont'd., LDR & Treatment Standards

Yes No Comments

Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)

☒

Notices, Certifications, and Demonstrations:

If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-

☒

- (i) EPA HW ID number?
- (ii) Appropriate treatment standards and prohibitions?
- (iii) Manifest number for the waste?
- (iv) Available waste analysis data?

☐
☐
☐
☐

If the waste is determined to be restricted but not required further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)

☒

Did the notification include: 268.7(a)(2)(i)-

- (a) EPA HW ID number?
- (b) Appropriate treatment standards and prohibitions?*
- (c) Manifest number for the waste?
- (d) Available waste analysis data?

☐
☐
☐
☐

Was the following certification signed: 268.7(a)(2)(ii)-

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Cont'd., LDR, Notices

■*Note: All notifications for F001-F005, F039 and wastes prohibited pursuant to 268.32 or RCRA Section 3004(d) must have the specific treatment standard entered on each form. Treatment standards for all other HWs may be referenced by including on the notification the sub-category of the waste, the treatability groups(s) of the waste(s), and the CFR section(s) and paragraphs where the treatment standards appear.

	Yes	No	Comments
■ If the generator's waste is subject to an <u>exemption from a prohibition</u> on the type of land disposal method utilized for such waste (e.g., a case-by-case extension under 268.5, an exemption under 268.6, or a nationwide variance), have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)	_____	_____	NA
Did the notice include: 268.7(a)(3)-			
(i) EPA HW ID number?	_____	_____	
(ii) Appropriate treatment standards and prohibitions?	_____	_____	
(iii) Manifest number for the waste?	_____	_____	
(iv) Available waste analysis data?	_____	_____	
(v) The date the waste is subject to prohibitions?	_____	_____	

NOTE: If an off-site shipment without notification has occurred, indicate the accepting TSD facility below for inspection follow-up.

■ If a generator is treating prohibited wastes in tanks or containers to meet applicable treatment standards, has a waste analysis plan been developed and implemented which:

■ (a) Is kept on-site in the generator's records? 268.7(a)(4)

■ (b) Is based on chemical and physical analysis of waste(s) being treated and contains all information to treat waste in accordance with standards, including the selected testing frequency? 268.7(a)(4)

NO on-site treatment

_____	_____	NA
_____	_____	

Cont'd., LDR, Treat./Containers

Yes No

Comments

■ (c) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)

✓

■ Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)

If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)

Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)

■ If a generator is managing a labpack that contains wastes identified in Part 268, Appendix IV, and wishes to use the alternative treatment standard under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(7)

NA

■ Complied with 268.7(a)(5) and (a)(6) and submitted the following certification? 268.7(a)(7)

"I certify under penalty of law that I personally have examined and am familiar with the waste and that the labpack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment."

■ If a generator is managing a labpack that contains organic wastes specified in Part 268, Appendix V, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(8)

NA

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste

Cont'd., LDR, Treat./Containers	Yes	No	Comments
■ (c) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)	✓		
■ Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)	✓		
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)			
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)			
■ If a generator is managing a <u>labpack</u> that contains wastes identified in Part 268, Appendix IV, and wishes to use the alternative treatment standard under 268.42, has the generator, with each shipment of waste, <u>noticed the treatment facility</u> pursuant to 268.7(a)(1)? 268.7(a)(7)			NA
■ Complied with 268.7(a)(5) and (a)(6) and submitted the following <u>certification</u> ? 268.7(a)(7)			
<p>"I certify under penalty of law that I personally have examined and am familiar with the waste and that the labpack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment."</p>			
■ If a generator is managing a <u>labpack</u> that contains <u>organic wastes specified</u> in Part 268, Appendix V, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, <u>noticed the treatment facility</u> pursuant to 268.7(a)(1)? 268.7(a)(8)			NA
<p>"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste</p>			

Cont'd., LDR, Notices/LABPACKS

and that the labpack contains only organic wastes specified in Appendix V to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment."

Yes No Comments

■ If the facility is a small quantity generator with tolling agreements pursuant to 262.20(e), has it complied with notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(9) and, _____

NA

■ Retained a copy, on-site, of notification, certification, and tolling agreement, for at least 3 years after expiration of agreement? 268.7(a)(9) _____

Special Rules for Wastes that Exhibit a Characteristic:

■ Did the initial generator determine each waste code applicable to the waste pursuant to 268.9(a) and (b)? _____ ✓

■ In addition to any applicable standards determined from the initial point of generation, has the characteristic waste that has been land disposed complied with the treatment standards under Part 268 Subpart D? 268.9(c) _____

■ Has a notification and certification, required in 268.9(d), been sent to the RA or authorized state for shipment of non-hazardous waste to a Subtitle D facility? 268.9(d) _____

■ Did the notification include the following: 268.9(d)(1) _____

(i) Name and address of the Subtitle D facility? _____

(ii) Description of waste as initially generated, including applicable EPA Hazardous Waste Number(s) and treatability group(s)? _____

Cont'd, LDR, Treatment

Yes

No

Comments

(iii) Applicable treatment standards at initial point of generation?

✓

■ Has the certification been signed by an authorized representative and does it state the language in 268.7(b)(5)(i)? 268.9(d)(2)

Treatment Facilities: Waste Analysis

Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)

not a treatment facility

■ Were the wastes listed in Attachment B of this checklist treated using the technology specified in Attachment D? 268.42(a)

■ Were non-liquid hazardous wastes containing HOCs in total concentration greater than or equal to 1000 mg/kg and liquid HOC-containing wastes prohibited under 268.32(e)(1) incinerated in accordance with the requirements of Part 265, Subpart O? 268.42(a)(2)

■ If wastes were not treated in compliance with methods specified in 268.42(a), (c), and (d), has the Administrator approved the use of an alternative treatment method pursuant to 268.42(b)?

■ As an alternative to Subpart D treatment standards, labpacks are eligible for land disposal provided the following requirements are met: 268.42(c)

■ Do the labpacks comply with the applicable provisions of 265.316? 268.42(c)(1)

■ Are all hazardous wastes contained in such labpacks specified in Appendix IV or Appendix V to Part 268? 268.42(c)(2)

Cont'd., LDR, Treatment

Yes

No

Comments

■ Have labpacks been incinerated in accordance with Part 265, Subpart O? 268.42(c)(3)

N/A

■ Have any incinerator residues from labpacks containing D004, D005, D006, D007, D008, D010, and/or D011 been treated in compliance with treatment standards in Part 268, Subpart D? 268.42(c)(4)

|

*These treatment standards do not apply where the waste is subject to a Part 268, Subpart C treatment standard for specific HOC such as a hazardous waste chlorinated solvent for which a treatment standard is established under 268.41(a).

Was the non-wastewater form of the following HWS listed in 268.10, 268.11, & 268.12, incinerated in accordance with the requirements of Part 264 Subpart O, or burned in industrial furnaces or boilers in accordance with applicable regulatory standards: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(3)

N/A

Was the wastewater form of the following HWS listed in 268.10, 268.11, & 268.12, treated by carbon adsorption or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(4)

|

Were the treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)

|

Were the treatment standards are expressed as concentrations which may not be exceeded by the waste or ... Continued on next page ...

Cont'd., LDR, Treatment

Yes No

Comments

...treatment residual for the allowable
land disposal of such waste or
residue, has the facility demonstrated
compliance with concentrations based
on grab samples (unless otherwise
noted in Attach. E)? 268.43(a)

NA

For CA list-only wastes, were the
applicable 268.32 Paint Filter Liquids
Test, pH test, HOCs, and PCB tests
performed? 268.7(b)(2)

For wastes with treatment standards
expressed as concentrations in the
waste (268.43), was the treatment
residue, not an extract, tested?
268.7(b)(3)

Notifications and certifications:

Has the treater submitted with each
shipment to the land disposal facility,
a notice including: 268.7(b)(4)

- (i) EPA HW ID number?
- (ii) Appropriate treatment standards
and prohibitions?
- (iii) Manifest number for the waste?
- (iv) Available waste analysis data?

Has the treatment facility submitted a
signed certification with each shipment
of waste or treatment residue to the
land disposal facility stating that the
treatment standards in 268 Subpart D
were met? 268.7(b)(5)

■ For wastes with treatment standards
listed as concentrations (268.41 or
-.43) did the certification read:
268.7(b)(5)(i)

I certify under penalty of law that I have personally examined and am familiar
with the treatment technology and operation of the treatment process used to
support this certification and that, based on my inquiry of those individuals
immediately responsible for obtaining this information, I believe that the
treatment process has been operated and maintained properly so as to comply
with the performance levels specified in 40 CFR 268 Subpart D and all
applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d)
without impermissible dilution of the prohibited waste. I am aware that there
are significant penalties for submitting a false certification, including the
possibility of a fine and imprisonment.

Cont'd., LDR, Treatment/ Notices Yes No Comments

For wastes with treatment standards listed as technologies (268.42) did the certification read:
268.7(b)(5)(ii) _____ NA

"I certify under penalty of law that waste has been treated in accordance with the requirements of 40 CFR 263.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment".

■ For wastes with treatment standards expressed as concentrations in the waste pursuant to 268.43, is compliance with the treatment standards in Part 268, Subpart D, based in part or in whole on the analytical detection limit alternative specified in 268.43(c)? 268.7(b)(5)(iii) _____

■ If yes, then the certification also must state the following:

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the non-waste water organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264, Subpart O or, 40 CFR Part 265, Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the non-waste water organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Were waste or treatment residues are sent off-site for further management, did the sender comply with the notification and certification requirements as the generator of the waste?
268.7(b)(6-7) _____ NA

If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)

(1) Treated, not just stored, the wastes in the impoundment? _____

Cont'd., LDR, Treatment: Surface Impoundments

	Yes	No	Comments
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?	_____	_____	NA
(2)(ii) Removed, annually, all treatment residues (including liquids) that do not meet treatment or prohibition standards?*	_____	_____	
(2)(iii) Not placed the residues in another impoundment for subsequent management?*	_____	_____	
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a))? 268.4(a)(3-4)	_____	_____	
Has the facility certified that it is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)	_____	_____	
Is there a principal means of treatment other than evaporation of HW constituents? 268.4(b)	_____	_____	
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7) -			
(i) Sampling the impoundment contents?	_____	_____	
(ii) The analysis of test data?	_____	_____	
(iii) The annual removal of residues which exhibit a HW characteristic?	_____	_____	
and: (A) Fail 268 Subpart D treatment standards? or:	_____	_____	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under:			
(1) 268.32 (CA list) or RCRA 3004(d)?	_____	_____	
(2) 268.33(f)(1st 3rd & 2nd 3rd)?	_____	_____	

*Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Cont'd., LDR, Disposal

Yes

No

Comments

Land Disposal Facilities:*

■ Except where the owner or operator is disposing of any waste that is a recyclable material used in a manner constituting disposal pursuant to 266.20(b), has the owner or operator of the land disposal facility:
268.7(c)

Have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1)
(See also 265.73, Operating Record)

Tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)

Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)

■ *NOTE: 268.8(a), which permitted restricted wastes under 268.33(f) to be disposed in a landfill or surface impoundment that met certain requirements, is no longer in effect as of May 8, 1990. 268.8(a)

NA

RECORDS SEPARATOR PAGE

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INSPECTION REPORT

Campbell Soup Company
6200 Franklin Boulevard
Sacramento, CA 95824
(916) 428-7890

EPA I.D. # CAD009198367

Inspected by: Alfred Fong, Associate Hazardous Materials
Specialist (AHMS), Department of Health Services
(DHS), Toxic Substances Control Division (TSCD),
Region I

Kim G. Ward, Hazardous Materials Specialist (HMS),
DHS/TSCD/Region I

Date of Inspection: August 23, 1988

Date of Report: August 24, 1988

I. Purpose

Resource Conservation Recovery Act Permit (RCRA) and Landban
Inspection

II. Representatives Present

Douglas Sinclair, Project Engineer, Campbell Soup Company
Randy Foster, Container Department, Campbell Soup Company
Alfred Fong, AHMS, DHS/TSCD/Region I
Kim G. Ward, HMS, DHS/TSCD/Region I

III. Ownership/Operator and Location

The Campbell Soup Company is the owner and operator of its
Sacramento Plant located at 6200 Franklin Boulevard. The
general office is located in Camden, New Jersey. The contact
at the Sacramento facility for environmental issues is
Douglas Sinclair at (916) 395-5027.

IV. Background

The Campbell Soup Company produces conveniences foods and
juices. On April 6, 1987, Campbell Soup was granted its
current Hazardous Waste Facility Permit.

The following is a summary of prior DHS' ISD or permit
inspection dates:

Date	Purpose of Inspection
September 23, 1981	ISD
May 27, 1982	ISD
November 4, 1982	PCB

January 14, 1983

August 2, 1983

May 10, 1985

May 29, 1986

January 29, 1987

April 6, 1987

Re-Inspection for PCB
non-compliance on 11/4/82

Permit issued; 1983-1988

Permit

Permit

RCRA

Permit issued; 1987-1992

Prior to the August 23, 1988 inspection, the permit document was reviewed and notices were mailed to the following agencies:

Central Valley Regional Water Quality Control Board
Sacramento County Environmental Health Director
Air Pollution Control District

The notice was to inform the agencies of DHS scheduled inspection at Campbell Soup Company.

Also, DHS Financial Responsibility Unit received Regional 1 schedule of inspection and updates monthly.

V. Facility Description

This facility produces and packages various food products including canned soups, sauces, and fruit juices. Cans are manufactured on site at a rate of approximately four million per day. Several wells supply domestic and industrial process water on the 123-acre site. The facility operates 24 hours a day, but hazardous waste drums are not transported to the storage area during the night shift. The plant has a sewer connection to the local sanitation district, and has a permit to discharge some of its industrial wastes to the system.

VI. Hazardous Waste Activity Description

Approximately 1,800 pounds of hazardous waste is generated monthly, most of which is solvent-based waste.

1. **Solvent Wastes:** The machine-cleaning and enamel paint-thinning solvents used contain the following compounds:

Machine Solvents

Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Xylene
2-Butoxy Ethanol
Aliphatic Hydrocarbons

Enamel Paint Solvents

Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Butanol
2-Ethoxy Ethanol
2-Butoxy Ethanol

The solvents used in enameling cans are reused until their percent composition drops below an effective level, and then the spent solvent is drummed, labelled,

and sent to the storage area. Both groups of solvents are recycled by Romic Corporation in Palo Alto, California.

2. Paint Residues: These wastes are generated during the can painting process and are picked up by American Waste Management (a California Permitted hauler) and sent to USPCI, a Class I disposal site in Utah.
3. Organic Solids: These residues from the use of the solvents in machine cleaning and can manufacturing are picked up for disposal at Casmalia by American Environmental Management (EPA I.D. # CAD980884183).
4. Tank Bottom Wastes: Product storage tanks are periodically cleaned and the wastes are picked up by American Environmental Management and are taken to a Class I disposal site.
5. Waste Oil: Waste oil from machine lubrication and forklift truck repair is recycled by Ramos Oil, a California permitted hauler and recycler.
6. Asbestos: Asbestos is periodically generated during the repair and maintenance of insulation around pipes in the facility. It is sent via a registered hazardous waste hauler to local landfills which will accept the waste.
7. Battery Acids: Batteries from various machines at the plant need occasional replacement. Battery bodies recycled; battery acids are disposed at Chemical Waste Management's facility in Kettleman Hills.

Wastes are collected at various locations in the plant. Solvent and paint wastes are collected in drums at the entrance to the C-1 oven. Machine cleaning wastes are collected on the dock near the flux room. Waste oil is collected from drip pans and gearboxes.

Wastes are stored in the enclosed drum storage area which is a corrugated metal building with skylights. The floor of the structure is concrete with a 2 -2 1/2" berm surrounding the base. The structure is posted with bilingual warning and "no smoking" signs. A telephone, a safety shower, a portable eyewash unit, and a fire extinguisher are situated just inside the entrance building. Personal safety equipment, consisting of gloves, aprons, rubber boots, masks, face shields, and respirators are stored in a large metal cabinet adjacent to the safety shower. Other emergency and spill control equipment is stored in or near the storage building.

Aisle spaces, drum labelling, and overall drum management conform to permit and Title 22, California Code of Regulations requirements. Any material spilled on the floor

of the structure must either be pumped out or mopped up since the storage building has no sewer connections. Spilled material is drummed and labelled as hazardous waste.

Security is maintained at the facility 24 hours per day. The entire property is surrounded by chain link fencing and all visitors and plant personnel must check in at guardposts near the gates to the plant.

The storage area is not lit at night, but wastes are not delivered, transferred, or shipped during the graveyard shift.

VII. Records Reviewed

The following records/documents were reviewed and were found to be in compliance.

Annual Report

Board of Equalization Hazardous Waste Disposal Report

Operational Plan

Training Records

Facility Permit

Daily Inspection Logs

Closure Plans

Manifests - Generator


Manifests - TSDF

VIII. Violation

No violations were found, and past noted violations have been corrected. The facility is very well maintained. Pictures were taken.

IX. Discussion with Management

Waste management practices were discussed with Douglas Sinclair and Randy Foster. No violations were noted.



Alfred Fong, AHMS
Date: 8/25/88

Kim G. Ward

Kim G. Ward, HMS

Date: 8/25/88

Brad Parsons

Brad Parsons, SR. HMS

Date: 8/26/88

AF:llm